

ORIGINAL FILED

MAY 15 1995

U.S. BANKRUPTCY COURT
KEENAN G. CASADY, Clerk
SANTA ROSA, CA

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450
In Propria Persona

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re

GERALD ARMSTRONG

Debtor

) Case No. 95-10911 aj

)
) GERALD ARMSTRONG'S
) EVIDENCE IN SUPPORT
) OF OPPOSITION TO
) SCIENTOLOGY'S MOTION
) FOR RELIEF FROM STAY
)
)
)

) DATE: May 25, 1995

) TIME: 9:00 a.m.

) DEPT: Hon.Alan Jaroslovsky

VOLUME I

INDEX TO EXHIBITS

1. Declaration of Hana Eltringham Whitfield;
2. Declaration of Dennis Erlich;
3. Declaration of Margery Wakefield;
4. Declaration of Keith Scott;
5. Declaration of Malcolm Nothling;
6. Declaration of Jonathan Atack;
7. Declaration of Nancy McLean.

Dated: April 12, 1995

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'G. Armstrong', written over a horizontal line.

Gerald Armstrong

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450

In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL,)
a California not-for-profit)
religious corporation,)

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON;
THE GERALD ARMSTRONG CORPORATION
a California for-profit)
corporation; DOES 1 through 100,)
inclusive,)

Defendants.

No. 157 680

**DECLARATION OF
HANA WHITFIELD
IN OPPOSITION TO
MOTIONS FOR SUMMARY
ADJUDICATION OF 20TH
CAUSE OF ACTION; AND
13TH, 16TH, 17TH &
19TH CAUSES OF ACTION
OF SECOND AMENDED
COMPLAINT**

Date: 4/21/95
Time: 9:00 a.m.
Dept: One
Trial: 5/18/95

1
2 DECLARATION OF HANA ELTRINGHAM WHITFIELD

3 I, Hana Eltringham Whitfield, declare:

4 1. I am over the age of 18 years. I am a resident of
5 the State of California and I have personal knowledge of the
6 matters set forth herein, and if called upon as a witness
7 herein I could testify competently thereto.

8 2. I was an active member of the Church of Scientology
9 International, hereinafter "CSI," and its predecessor, the
10 Church of Scientology of California, hereinafter "CSC," from
11 March, 1965 to August, 1984.

12 3. Appended hereto as Exhibit A is a true and correct
13 copy of my declaration executed April 4, 1994 and filed in the
14 case of Church of Scientology International v. Steven Fishman
15 and Uwe Geertz, Case No. CV 91 6426 HLH. This declaration
16 provides accurate information as to my history in Scientology,
17 the positions I held and my responsibilities, the lengthy
18 training I received in the auditing techniques of Scientology
19 founder and leader L. Ron Hubbard, hereinafter "Hubbard," and
20 in his organization and executive management techniques, and
21 some of the extensive knowledge I have of Scientology's
22 policies, bulletins and procedures. It also contains a
23 description of the extreme hardships I experienced while a
24 Scientologist and the insidious "fair game" practices to which
25 my husband, Jerry Whitfield, and I were subjected after we
26 left Scientology and dared to discuss our experiences and
27 opinions. We continue to be targets of fair game to this day.

1
2 4. My husband and I now work professionally with
3 families who have a loved one in Scientology. Families hire
4 us to inform and educate their loved ones about the secret and
5 hidden, and the actual, policies and practices of Scientology
6 and their dangers, and of Scientology's ongoing, complex
7 campaign to keep these secrets hidden from the public and from
8 most of its members until they have been completely
9 indoctrinated and are under Scientology's absolute control.
10 Having the information we provide, the loved ones are then
11 more able to make informed choices about their adherence to
12 Scientology and participation in its activities. My husband
13 and I also work with Scientologists who have doubts about
14 their involvement in Scientology and approach us on their own
15 for information. We have been doing this work of informing
16 and educating successfully since 1985.

17 5. Because of my long tenure in Scientology and holding
18 many executive positions, I have personal knowledge of the
19 fact that people are drawn into Scientology by false
20 representations and then held in it by various manipulative
21 techniques, often to their physical, emotional and mental
22 detriment.

23 6. As an example, I was drawn into Scientology in early
24 1965, in Johannesburg, South Africa, through reading Hubbard's
25 book, "Dianetics the Modern Science of Mental Health," by its
26 astonishing claims, some of which were:

27 A. Those who reach "clear," a state guaranteed by
28

1 Hubbard, can be tested for any and all psychoses,
2 neuroses, repressions and compulsions (all aberrations)
3 and can be examined for any autogenetic (self-generated)
4 diseases, also known as psychosomatic ills, and the tests
5 will show the "clear" entirely free of such.

6 B. Tests of the clear's intelligence will show it to be
7 high above the norm.

8 C. A clear can remember everything that has ever
9 happened to him and everything he has studied.

10 D. A clear's health is greatly improved and he will
11 never again experience any psychosomatic illness of any
12 kind. A clear never gets colds.

13 E. A clear's ethical, moral and professional standards
14 are the highest.

15 F. A clear thinks and acts completely rationally in any
16 circumstances at any time.

17
18 7. After reading "Dianetics" I was convinced that
19 Hubbard had discovered the cure for all mental and physical
20 ills, that attaining clear was the most desired aim in the
21 world and should be sought by the whole human race. So strong
22 were my beliefs, started by my reading of "Dianetics," that I
23 held them unwaveringly for twenty years, despite experiences
24 that, were I in a normal frame of mind, would have caused me
25 to leave the group many years earlier, and despite continually
26 seeing behavior and mental and physical conditions in "clears"
27 and in Hubbard himself, which belied his Dianetics promises.

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2 8. The book, "Dianetics the Modern Science of Mental
3 Health," which is used extensively in the Scientology
4 organization in its initial "auditing" programs and "auditor"
5 training, was considered so important by Hubbard and
6 Scientology's senior management executives, that its public
7 bookstore sales records were manipulated and falsified for
8 years by Scientologists in order to keep it on the U.S. "best
9 seller" lists. "Auditing" is Scientology's psychotherapeutic
10 processing, which it calls, for "religious" purposes,
11 "pastoral counseling."

12 9. While becoming involved in the Johannesburg
13 Scientology Organization I also heard many stories about
14 Hubbard and read Scientology's biographies about him. These
15 included the stories that he was a much decorated hero of
16 World War II, that he received extensive war wounds including
17 blindness and lameness, yet recovered fully through his own
18 research and techniques, which he had further developed into
19 Dianetics and included in his book. I was deeply impressed
20 with what I heard and read about him.

21 10. I know hundreds if not thousands of Scientologists
22 across the years who were drawn into Scientology by the same
23 claims as I was.

24 11. Once in contact with Scientologists, neophytes (what
25 Scientologists cynically call "raw meat") are manipulated and
26 indoctrinated rapidly and more deeply into an array of false
27 and delusionary convictions about Scientology. From personal
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1
2 experience some of these are:

3 A. That only Hubbard's procedures in Scientology can
4 break one free of the repetitive, never-ending birth-
5 death pattern, also known as reincarnation, a core belief
6 of Scientology. It is often stated that "Scientology is
7 the only road to total freedom."

8 B. That only Scientologists have the answers to the
9 Universe and Life itself.

10 C. That only by strict and unconditional adherence to
11 Scientology's policies and practices, can one regain
12 one's complete abilities and eternal survival as a
13 spiritual being.

14 D. That the whole human race except for Scientologists
15 is doomed to eternal oblivion.

16 E. That a Scientologist will only progress in life and
17 reach his spiritual and physical goals by living and
18 associating with other Scientologists, to the point of
19 severing connections to family and/or spouse and children
20 and/or friends if they are disinclined to become
21 Scientologists, are slow in showing interest, or express
22 criticisms or diverging perspectives to those of
23 Scientology.

24 F. That a Scientologist living on his own in a non-
25 Scientology or "wog" community will be unable to maintain
26 the improvements he achieved in Scientology, but will
27 uncontrollably deteriorate into, the same eternal
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2 oblivion destined for "wogs."

3 G. That people who frequently display emotions of
4 antagonism, anger, fear, sorrow, apathy or even chronic
5 pain, are deemed by Hubbard to be chronically "down tone"
6 or low in emotional tone. Hubbard wrote that such people
7 cannot be reasoned with, that they do not deserve any
8 civil rights of any kind and that one of two ways to deal
9 with them is to dispose of them quietly and without
10 sorrow. From this contemptuous and antisocial attitude
11 the fair game doctrine became acceptable to
12 Scientologists.

13 H. That all Hubbard's writings, taped lectures,
14 policies, bulletins and techniques are "sacred
15 scriptures" which cannot be changed or canceled except by
16 Hubbard himself - even though he died in 1986.

17 I. That all Hubbard's writings, taped lectures,
18 policies, bulletins and techniques - the sacred
19 scriptures - are correct as written and any disagreement
20 with them or difficulty with them by anyone reading or
21 studying them is the reader's or student's fault, not
22 Hubbard's.

23 J. That any criticism of Hubbard, his family, writings,
24 techniques, policies or philosophy is tantamount to a
25 criminal act and shows that the person has undisclosed
26 crimes against Hubbard or Scientology.

27 K. That if a person's information can be controlled the
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1
2 person can be controlled. Hubbard was a master of
3 control of information within Scientology's ranks.

4 L. That criminal or socially deviant actions which were
5 carried out by Scientology and later exposed, were
6 "against policy" and done by misguided "individuals" who
7 went astray.

8 12. The most glaring example of how Scientology deals
9 with its exposed criminality is the following. In 1966
10 Hubbard formed within Scientology and organization called the
11 Guardian's Office, hereinafter "GO." Its publicly stated
12 purpose was to "safeguard Scientology." Its hidden agenda,
13 based on Hubbard's policies or "scriptures," was to attack,
14 sue, intimidate, harass and threaten into silence anyone who
15 spoke and wrote negatively about Hubbard and his group. The
16 vast majority of Scientologists knew nothing of the acts,
17 including serious crimes, against people, or Hubbard's secret
18 policies which brought them into being. They believed the GO
19 was constructively extending Scientology's influence into
20 society through social programs such as education, drug
21 addiction, conducting charity drives, and other public
22 relations "good works." When eleven top Scientology
23 executives, including Hubbard's wife Mary Sue Hubbard, were
24 convicted and imprisoned in the late 1970s Scientologists the
25 world over, including my husband and me, were told that the
26 trial was unjust in the extreme as all Mary Sue and her GO
27 staff had done was steal xerox paper. We never were told that
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2 the eleven GO staff were imprisoned for obstruction of
3 justice, breaking into Justice Department offices, wire
4 tapping, and impersonating federal officials, among other
5 things. We were also never told about the GO's covert
6 intelligence operations and terror tactics against targeted
7 individuals, how the GO set them up in "crimes," and had them
8 falsely prosecuted, which surfaced through the 1977 FBI raid
9 on GO headquarters in Los Angeles and Washington, D.C.
10 Scientology staff were forbidden to read newspapers and
11 magazines or to watch TV in the late 1970s and early 1980s at
12 Scientology's central base in Clearwater, Florida, and we were
13 forbidden to speak to journalists; all of which prohibitions
14 kept us uninformed of true events. Then in the early 1980s,
15 due to its tarnished public image, the GO was renamed the
16 "Office of Special Affairs," hereinafter "OSA," and was
17 allegedly "reorganized." Scientologists over the world were
18 told that those responsible for the crimes had been removed
19 and that "we don't do that anymore."

20 13. The experiences of many former Scientologists during
21 the post-GO, OSA era, however, including those of Gerald
22 Armstrong, hereinafter "Armstrong," and my husband and me, as
23 well as lawyers litigating against Scientology and other
24 viewed "enemies," show that the practices of harassment,
25 intimidation, threats, law suits and more continue unabated.
26 In essence, the practice of fair game goes on as before.

27 14. In our work, my husband and I use a great deal of
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2 information made public by Armstrong. This includes his
3 declarations in various lawsuits as well as his own lawsuit,
4 Church of Scientology of California v. Gerald Armstrong, Mary
5 Sue Hubbard Intervenor, Los Angeles Superior Court No. C
6 420153, which resulted in 1984 in the widely known and used
7 "Breckenridge decision." This decision, in Armstrong's favor,
8 condemned fair game and other Scientology practices including
9 the misuse of Scientologists' confessions in supposedly
10 confidential auditing sessions. The Armstrong case also
11 brought to light Armstrong's discoveries of many lies Hubbard
12 told about his past and his credentials, which were used in
13 Scientology's promotion and marketing of its services, as well
14 as fair game actions against perceived enemies.

15 15. The information about Scientology's secret agenda,
16 fair game practices and Hubbard's misrepresentations which was
17 revealed through the Armstrong trial and case provided many
18 Scientologists access to the truth about Scientology for the
19 first time, and enabled many to break free from Hubbard's and
20 Scientology's manipulation and hold.

21 16. My husband and I have ourselves been targets of
22 extensive fair game operations and "black propaganda," since
23 1985. Black propaganda is a term Hubbard used to designate a
24 practice of destroying someone's reputation with lies, often
25 from hidden or unnamed sources. Those operations that my
26 husband and I know of are detailed in my declaration, Exhibit
27 A, at paragraphs 69 to 93 and 128 to 135. In summary, we have
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1
2 been subjected to:

3 A. Surveillance by Scientology hired private
4 investigators, hereinafter "PI's," and Scientology staff
5 24 hours a day for weeks at a time in the United States
6 and Europe.

7 B. Surveillance by Scientology PIs and staff while
8 talking with families and their loved one.

9 C. Repeated false accusations on TV, radio and in
10 writing, that we were kidnappers and do forced
11 deprogrammings.

12 D. Repeated attempts to obtain our long distance phone
13 records.

14 E. Invasion of our AMEX credit card accounts by
15 impersonating my husband.

16 F. Harassment of our families in America, Europe and
17 South Africa by Scientology PI's, some of whom
18 represented themselves as federal government officials.

19 G. Filing false complaints against us with various
20 State authorities. None of these came to anything.

21 H. Attempting to implicate my husband falsely in a bomb
22 threat against a Scientology front group, Sterling
23 Management Systems, in 1989. (In the late 1970s
24 Scientology was found responsible for the harassment of
25 New York freelance writer Paulette Cooper, including the
26 manufacture of false bomb threats by Cooper.)

27 I. Harassment of at least fifty of our friends and
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1
2 associates by Scientology PI's in America, Canada, Europe
3 and Australia.

4 J. Creation of "dead agent" packs of information
5 designed to destroy my husband's and my reputations.
6 Innumerable copies of these, each different from the
7 last, have been mailed to friends and colleagues, and
8 even persons we did not know, and handed out at
9 conventions, conferences and meetings of former
10 Scientologists and/or former cult members. Dead agent
11 packs on myself include three different, and false,
12 charges that I killed my father thirty years ago, that I
13 masterminded his murder by another, and that I attempted
14 the murder myself. The packs contain photographs of a
15 severely battered, bruised and unrecognizable dead man's
16 face. They contain my younger sister's 1946 affidavit
17 which detailed incest she experienced while growing up.
18 They contain memos written in the early 1990s by my
19 former husband Guy Eltringham, an active Scientologist,
20 to OSA, giving them information about me under the
21 headings, "Possible means to reduce her influence or
22 effect," and "Other information which possibly would not
23 be in her ethics or pc ("preclear," auditing, or
24 "pastoral counseling") files."

25 K. David Miscavige, head of Scientology world wide,
26 falsely told over 700 top Sea Organization staff in the
27 early 1990s that I killed my father and was serving time
28

1
2 in a South African prison. (The Sea Org is the top
3 echelon of Scientology management and operations wherein
4 the members sign a contract for a billion years.)

5 L. False accusations by Scientology attorneys that my
6 husband and I were guilty of theft of Scientology
7 documents.

8 M. A malicious and completely unsubstantiated lawsuit
9 filed against my husband and me for "false imprisonment."
10 The plaintiff, a Scientologist, who was following us, was
11 stopped and briefly detained by police for suspicious
12 behavior and apparently driving an unlicensed vehicle.
13 Thereafter he filed the lawsuit against us. He dismissed
14 the suit in 1993.

15 N. Scientologists have repeatedly demonstrating outside
16 our home, carrying signs and handing out leaflets stating
17 that we are kidnappers, that I am a murderer, and my
18 husband a thief, drug dealer and wife beater.

19 17. While in Scientology and going through extensive
20 training in Hubbard's auditing techniques, I was gradually
21 exposed to and became familiar with Hubbard's writings and his
22 attitudes concerning God, Jesus Christ and Christianity.

23 18. In 1965, after I arrived at Hubbard's then worldwide
24 Scientology Headquarters at Saint Hill in East Grinstead,
25 England, I was a full time student. Toward the end of 1965 or
26 early 1966, because of a wave of anti-Scientology sentiment in
27 the press, Hubbard gave orders that all Saint Hill "auditors"
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1
2 were to wear clerical garb and a "Scientology cross," and that
3 from then on "Sunday Services" were to be held in the
4 "Chapel." In fact the "Chapel" was routinely and usually used
5 as a course room. It was the course room in which I studied
6 10 or more hours daily, and sometimes seven days a week. I
7 was confused when I first heard Hubbard's orders; I had not
8 previously known his public statement that Scientology was a
9 religion. Hubbard further told the Saint Hill staff and
10 students, myself included, that his orders were to create the
11 impression among the government, press and public that
12 Scientology was a proper religion. But it was common
13 knowledge among dedicated Scientologists that Hubbard's orders
14 were designed to deceive non-Scientologists in order to gain
15 acceptance for Scientology.

16 19. In 1966, while studying the upper levels of the
17 "Saint Hill Special Briefing Course," which covered all of
18 Hubbard's "technical" developments from 1950 to 1966, I
19 studied a bulletin entitled "Routine 3 Heaven," dated May 11,
20 1963, a true and correct copy of which is appended hereto as
21 Exhibit B. In it, to my increasing astonishment and concern,
22 Hubbard wrote that he did not believe in Christianity, God,
23 Heaven and Christ. He wrote, moreover, that he had just
24 discovered that Heaven did exist as an electronic implant,
25 that it was created by an false belief by an "implant station"
26 43 trillion years ago, that the implant contained "angels,"
27 "plaster saints," signs to "Hell," the "pearly gates,"
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"Joseph," the "Madonna and child," "Bethlehem," and various other Biblical symbols. Hubbard wrote that the implant, Heaven, was false and full of lies, and that religion was based on lies. He wrote that the "Creator of Heaven" had entrapped us all and that only Scientology had the way to free us again.

20. Having been brought up in a basically Christian family, and having attended church regularly while growing up, and personally believing in Christ and God, I was shocked to read this and other related bulletins with similar anti-Christian and anti-religion assertions.

21. However, because of Hubbard's claims in the bulletin that the information was discovered through thousands of hours of "scientific research" and not based on opinion, that all Scientology data came from "long, arduous and painstaking research" and is "common to all minds and all men and can be demonstrated on anyone," and that he and Scientology sought "freedom, the betterment of Man," that he had researched and compiled it for "the greatest good for the greatest number," and, importantly, that honest people could accept it, and because of my faith in Hubbard, I consciously chose, without further independent investigation, to accept it as correct over the religious faith of my upbringing. All Scientologists who get past this point do the same.

22. From then on I felt I was one of the initiated, one of the chosen and that I was really on the "Road to Total

1 Freedom." The "special" nature of Scientology and its unique
2 role in the salvation of mankind was deeply re-emphasized in
3 my mind. From then on I was fully aware of Hubbard's
4 duplicity in molding Scientology's double agenda. Externally
5 Scientology showed itself as religious and sensitive to deep
6 social and humanitarian issues and actively participating in
7 social activities of all kinds. Internally it condemned all
8 religious believers as aberrated and worthless, and, depending
9 on their degree of opposition to Scientology, labelled them
10 merely a nuisance, or suppressive and "fair game."

11
12 23. From that point on I regularly read Hubbard's
13 writings or listened to his tape lectures which stated his and
14 Scientology's anti-religious beliefs and practices. In late
15 1968 or early 1969, on board Hubbard's flagship, the "Royal
16 Scotman," I read a bulletin by Hubbard entitled "Resistive
17 Cases Former Therapy," dated September 23, 1968, a copy of
18 which is appended hereto as Exhibit C, which expanded on his
19 "scientific research" assertion that God and Christ are
20 electronically implanted ideas. He wrote that Christ was part
21 of an implant 75 million years ago, that the Niocene Creed
22 invented Him to "implant their way to power," and that the
23 Christian Church still uses implanting.

24 24. Miscavige, Scientology's current leader, recently
25 mandated that eligibility for OT 9 and OT 10, the "top" levels
26 on Scientology's auditing pyramid not yet "released" for
27 public consumption, includes completing the "Saint Hill
28

1
2 Special Briefing Course." From personal experience I can
3 verify that the more a Scientologist is exposed to and
4 indoctrinated in Hubbard's fantastic beliefs and ideas, the
5 more ardent, aggressive and criminally inclined the
6 Scientologist becomes, and more like Hubbard.

7 25. Throughout the years I practiced and applied
8 Hubbard's auditing techniques, in the 1960s, 70s and 80s, I
9 can verify that those Scientologists who held onto religious
10 and spiritual beliefs and values not espoused by Scientology,
11 despite being gradually exposed to teachings such as those in
12 Exhibits B and C hereto, were considered particularly
13 "aberrated." In the early stages of their adherence to
14 Scientology, such persons were quietly tolerated and smugly
15 labeled as "former therapy cases." (Ex. C) Then at some
16 point, and at the direction of their "case supervisor," they
17 were ordered into specific auditing actions designed to
18 systematically desensitize their particular religious beliefs
19 and ideas. They were also frequently ordered to obtain "case
20 cracking auditing" to resolve their "religious aberrations"
21 and to simultaneously study Scientology teachings.

22 26. This was done not only with Christian-thinking
23 people. During the years of 1968 through the early 1970s when
24 we sailed the northern African and Moroccan coastlines with
25 Hubbard, I heard him say several times that any Arab or
26 Moroccan who wanted to join the ship's crew could do so as
27 long as he or she passed basic security requirements, and
28

1
2 could remain on board indefinitely only if he or she fully
3 converted to Scientology and had received full auditing
4 resolution of his or her former beliefs and practices.
5 Hubbard said that only such full conversion would raise them
6 above suspicion and enable them to stay.

7 27. I feel very strongly that it is in the public's
8 interest to continue to have complete access to information
9 that Armstrong helped make public, and in which he is an
10 authoritative source. Public individuals and Scientologists
11 have a right to all the information available about
12 Scientology, both good and bad.

13 28. It is unconscionable that Scientology thinks that it
14 can say whatever it wants about Armstrong's information and
15 knowledge, about his legal cases, and about Armstrong himself,
16 and that Armstrong cannot even respond, much less have the
17 same freedom to say what he knows to be true about himself and
18 Scientology. It is unconscionable that Armstrong's former
19 attorney Michael Flynn, in order to get himself out from under
20 the threat of fair game, permitted such an agreement to be
21 presented to Armstrong and his other clients to "settle" their
22 cases. It is also unconscionable that any court in this or
23 any country could consider, much less order, the enforcement
24 of such an "agreement." There are very few who stand up to
25 the evil that Scientology practices. These should be
26 supported by our justice system, not silenced.

27 I declare under the penalty of perjury under the laws of
28

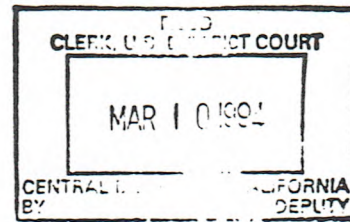
1
2 the California that the foregoing is true and correct.

3 Executed in Los Angeles, California this 6th
4 day of April, 1995.

5
6 Hana Eltringham Whitfield
7 Hana Eltringham Whitfield
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5 Attorneys for Defendants
6 UWE GEERTZ, PH.D.



7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 CHURCH OF SCIENTOLOGY)
12 INTERNATIONAL,)
13 Plaintiff,)
14 vs.)
15 STEVEN FISHMAN and UWE GEERTZ,)
16 Defendants.)

No. CV 91-6426 HLH (Tx)

REvised DECLARATION OF HANA
WHITFIELD RE MOTION FOR COSTS

Date: APRIL 4, 1994

Time: 10:00 a.m.

Courtroom: 7

21
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26 RECEIVED

27 MAR 18 1994

28 HUB LAW OFFICES

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1 of Mental Health ("DMSMH") in 1965 in South Africa. I started
2 auditor training in Johannesburg then went to Saint Hill, England
3 and received advanced auditor training through Level 7, the highest
4 auditor and case supervisor training level available at that time.
5 I also completed Hubbard's Organization Executive Course, a multi-
6 volume course covering all Hubbard's organizing, business
7 management, finance, establishment, promotional and public relations
8 policies and procedures, during which I learned how to run a
9 Scientology Organization.

10 6. I received auditing up through the state called "Clear."
11 Hubbard's Technical Dictionary contains thirteen definitions for
12 the state, attached hereto as **Exhibit 1**, some of which are: "A
13 Clear, in an absolute sense, would be someone who could confront
14 anything and everything in the past, present and future." (Taken in
15 part from Ability Minor Magazine Number 256); "A Clear has no
16 vicious reaction mind and operates at total mental capacity just
17 like the first book (Dianetics The Modern Science of Mental Health)
18 said. In fact every early definition of Clear is found to be
19 correct." (Taken in part from Hubbard Bulletin 2 April 1965, "The
20 Road to Clear"); "To clear: to release all the physical pain and
21 painful emotion from the life of an individual." (Taken from
22 Hubbard's book, DMSMH.)

23 7. I served one year as contracted staff at the Los Angeles
24 Organization in 1966 and 1967 after which, by special invitation, I
25 joined Hubbard's Sea Project¹ in Las Palmas, Canary Islands.

26 ¹Sea Project - The first phase of Hubbard's gradual move from
his English worldwide headquarters at Saint Hill Manor, Sussex, in
1966 onto a small yacht, the "Enchanter", which was manned by
Scientologists. The yacht sailed in English waters. In 1967
Hubbard accrued a second ship, the "Avon River," also manned by

1 Hubbard assumed the title of Commodore² in 1966 or 1967. The Sea
2 Project grew into the Sea Organization³ ("Sea Org") which was looked
3 upon as Scientology's 'elite.' Even though we were Scientologists
4 and ordained ministers, Hubbard had us wear naval type uniforms and
5 insignia, and sign billion year contracts. For the next eight years
6 through 1975, I served on two of Hubbard's ships, on the "Avon
7 River," later renamed the "Athena" and the "Royal Scotman," later
8 renamed the "Apollo." I held positions including those of Ship's
9 Captain, Deputy Captain, Commodore's Staff Aide, Deputy Commodore
10 for the United States and others, and was immediately subordinate to
11 Hubbard for most of this time.

12 8. Hubbard once spoke about his strategies for "handling" his
13 enemies. The best way was to, literally, drive them crazy, to use
14 all one's resources to find their weaknesses and hit them hardest
15 where it hurt the most. He said there were few men in history who
16 mastered the techniques to do so successfully. He intimated he was

17
18 Scientologists. Both ships were sailed to the Canary Islands to
19 join Hubbard who was already living there.

20 ²Commodore - the rank which Hubbard held in the Sea
21 Organization, the head of the flotilla and related organizations
which carried out and helped him to carry out his duties. (Taken
in part from Hubbard's Flag Order 3342.)

22 ³Sea Organization - "... is composed of the "aristocracy" of
23 Scientology ...". (Taken in part from Hubbard's Flag Order 508.)
24 "... In 1968 the Sea Org became a goodwill activity and an
25 efficient administrative arm of Scientology. The Sea Org runs the
26 Advanced Organizations and is the custodian of the Clear and OT
27 [upper level sacred scriptures] processing materials." (Taken in
28 part from Ron's [Hubbard's] Journal 1968.) "... a fraternal
organization existing within the formalized structure of the
churches or Scientology. It consists of highly dedicated members
of the Church. These members take vows of eternal service. The
Sea Organization life style of community living is traditional to
religious orders. (Taken in part from Board Policy Letter 9 March
1974).

1 one.

2 9. By 1975, Hubbard's auditing techniques were already
3 affecting me negatively. I had almost constant migraine headaches
4 and was scared that Hubbard's techniques no longer worked on me.

5 10. In October 1975, Hubbard moved his organization ashore to
6 Clearwater, Florida. From then on to the early 1980s, I got worse.
7 I couldn't get medication strong enough to stop the never ending
8 pain. By early 1976, I developed suicidal ideation because I
9 couldn't conceive any other way to stop the pain. It continued
10 unabated until well after I left the Sea Org in March 1982.

11 11. In 1984, I experienced a disaster with a CSI front group,
12 Sterling Management Systems ("SMS"). SMS promoted Hubbard's
13 business management policies to doctors, dentists and chiropractors
14 to way to expand their business and double their income. SMS
15 claimed no connection to CSI though its consultants, including
16 myself, knew otherwise. The despicable treatment I saw meted out to
17 two decent dentists in a San Bernadino clinic, and to me and my
18 superior, by Sterling staff and by Scientologists, shocked me so
19 deeply that I left CSI. Both dentists paid for expensive SMS
20 consultants to introduce Hubbard's management techniques into their
21 practice, train their employees and double their income by year's
22 end.

23 12. The dentists were pushed to buy a CSI auditing package for
24 nearly \$1,000 an hour, with a minimum of 25 hours, for each dentist.
25 They saw their budget overextend and put a stop on the check. On the
26 same day, the dentists heard one of their SMS consultants, who
27 touted no connection between SMS and CSI, talk about the
28 transgressions they had divulged to their auditors in confidential

1 priest-penitent auditing sessions. The same day, one dentist's wife
2 bought home a pack of critical CSI news articles from the public
3 library.

4 13. SMS and CSI went into overdrive and the screaming and
5 duress began. The dentists were threatened: to make the check good
6 one dentist was blackmailed and the other was told he would
7 reincarnate as a rock in his next life. My superior and I were
8 fired two weeks later, and I left Scientology forever.

9 14. I then began a long recovery, searching for answers as to
10 why I joined Scientology and gave it twenty years of my life only to
11 end up suicidal and in chronic ill health.

12 SCIENTOLOGY POLICY ESTABLISHING LINES OF AUTHORITY WITHIN
13 SCIENTOLOGY.

14 15. In order to understand how Hubbard directed Scientology
15 throughout its myriad corporations almost up to his death in 1986
16 and how the authority he created has continued thereafter, one has
17 to understand his foundational policies⁴. Hubbard's policies
18 established all lines of authority, corporate structures and job
19 descriptions in CSI. His policies had seniority over those of
20 others without exception, regardless of corporate or organization
21 positions. His policies were permanently valid unless cancelled by
22 Hubbard himself.

23 16. Hubbard Policy of 13 March 1966, "Orders, Precedence of
24 Personnel, Titles Of," attached hereto as Exhibit 2, states, "The
25 following table gives the precedence ... of orders or directions in
26 Scientology. This table shows what order to follow first and if one

27 ⁴Policies - the principles or laws by which the conduct of
28 affairs can be guided; the laws on which orders are originated and
29 authorized; the rules of the group.

below is contrary to one above, follow the upper one." (emphasis added) The first three entries are Board Resolution, Policy signed by Hubbard, Bulletin signed by Hubbard, and so on down the chart. Orders originated and signed by others come after these four. The policy continues, "No order lower on the scale may cancel or set aside an order above it on the scale ... Any written or published order may be cancelled by a published order senior to it on the above chart except that, traditionally, board minutes cannot cancel policy letters or bulletins, these being originated or modified by the Executive Director whose powers only are ratified by the board."

17. On 13 August 1967, during the early days of the Sea Project, Hubbard wrote Flag Order⁵ #5, "Staff Conduct," attached hereto as Exhibit 3. It states, "The order of importance of ... orders is: (a) Commodore's (Hubbard's) concerns first, (b) others second. Do both. Both are important." This Flag Order was never cancelled by Hubbard.

18. In 1978 Hubbard wrote, "The Code of a Sea Org Member," attached hereto as Exhibit 4. It states, "I promise to uphold, forward and carry out Command Intention⁶." This Code was never cancelled by Hubbard.

19. Another Hubbard policy of 24 September 1970, "Issues⁷-Types Of," attached hereto as Exhibit 5, clarified the value of

⁵Flag Order - the equivalent to a policy in the Sea Org.

⁶Command Intention - an idea or impulse that Hubbard was going to accomplish. It was intentional, meaning that Hubbard meant to do it.

⁷Issues - the policies, bulletins, directives of various kinds, evaluations, plans, programs, projects and printed orders which were distributed throughout world wide Scientology or which were originated by and distributed within a single Scientology organization or group only.

1 various major types of issues: "HCOPL - Hubbard Communications
2 Office Policy Letter. Written by LRH only. This is a permanently
3 valid issue of all third dynamic (group), org and administrative
4 technology ... HCOBs - Hubbard Communications Office Bulletins.
5 Written by LRH only. These are the technical issue line. They are
6 valid from first issue unless specifically cancelled ... The above
7 are the ... main lines of issue of valid data. They have first
8 priority on mimeo and in distribution." This policy was never
9 cancelled by Hubbard.

10 20. A later CSI Policy Directive #19 of 7 July 1982, "The
11 Integrity of Source," attached hereto as Exhibit 6, stated, "It is
12 hereafter firm Church policy that LRH ISSUES ARE TO BE LEFT INTACT
13 AS ISSUED. No one except LRH may cancel his issues. No one except
14 LRH can revise his issues ..." It was written and issued by the
15 Watchdog Committee, a division of CSI.

16 21. These Hubbard policies laid an automatic response into Sea
17 Org members and Scientologists - that their first loyalty was to
18 Hubbard as head of the Sea Org and Scientology, not to the
19 Commanding Officer of their own organization and even less so to
20 their direct organization superior. This loyalty remains so into
21 the present. Current and former Scientologists would all say that
22 they would follow Hubbard's orders or a Commodore's Messenger's⁸
23 orders rather than that of their Commanding Officer, attached hereto
24 as Exhibit 7.

25
26 ⁸Commodore's Messenger - a direct representative of Hubbard,
27 the Commodore. The orders of a Commodore's Messenger are
28 considered as those of the Commodore, as per Hubbard Flag Order
3729 of 15 September 1978, "COMMODORE'S MESSENGERS," attached
hereto as Exhibit H.

1 MISREPRESENTATIONS AND CONCEALMENTS IN DECLARATION OF DAVID
2 MISCAVIGE. Misrepresentation That Criminal Acts Done in the
3 Past Were Aberrational Acts By The Discredited And Defunct Guardian
4 Office Rather Than Mandated By Hubbard's Policy.

5 22. David Miscavige ("Miscavige"), in his February 17, 1994
6 declaration filed herein, misdirects the attention of this Court by
7 misrepresenting that criminal acts done in the past were
8 aberrational acts by the discredited and defunct Guardian Office
9 ("GO") and concealing that such criminal acts were, and still are,
10 mandated by Hubbard's policy. (Miscavige declaration, pages 19 and
11 26). He also said (page 39), "... the only reason that the Youngs
12 feel safe enough to make their outrageously false allegations of bad
13 conduct and harassment against the Church and me is because they
14 know there will be no "Fair Game" retaliation, thanks to my kicking
15 out the GO and putting a permanent end to their abuses." (Miscavige
16 declaration, page 39).

17 23. Miscavige's claims are false. The defunct GO is the wrong
18 direction to look for blame and the wrong source to focus it on.

19 24. To look in the right direction and at the right source,
20 one must go to Hubbard's own policies.

21 25. In a taped lecture in June 1952, "The Journal of
22 Scientology, Issue 18-G," attached hereto as **Exhibit 8**, pages 1 and
23 2, Hubbard said, "The only way you can control people is to lie to
24 them ... When you find an individual is lying to you, you know that
25 the individual is trying to control you. That is the mechanism of
26 control.....Not "is going to", but "is lying to you." This taped
27 lecture was never cancelled by Hubbard.

28 26. A Hubbard bulletin of 5 November 1967, "Critics of

1 Scientology", attached hereto as Exhibit 9, states, "Now, get this
2 as a technical fact, not a hopeful idea. Every time we have
3 investigated the background of a critic of Scientology, we have
4 found crimes for which that person or group could be imprisoned
5 under existing law. We do not find critics of Scientology who do
6 not have criminal pasts. Over and over we prove this." Hubbard
7 continued on page 2, "Two things operate here. Criminals hate
8 anything that helps anyone, instinctively. And just as
9 instinctively a criminal fights anything that may disclose his past
10 ... If you, the criticized, are savage enough and insistent enough
11 in your demand for the crime, you'll get the text, meter⁹ or no
12 meter. Never discuss Scientology with the critic. Just discuss his
13 or her crimes, known and unknown. And act completely confident that
14 those crimes exist. Because they do." This is a key Hubbard
15 bulletin which lays the foundation for the beliefs and the actions
16 of Scientologists. Other Hubbard writings amplify it. This
17 bulletin was never cancelled by Hubbard.

18 27. In mid-March 1955, Hubbard wrote the "Dissemination of
19 Material," attached hereto as Exhibit 10, which states: "The purpose
20 of the suit is to harass and discourage rather than to win. The law
21 can be used very easily to harass, and enough harassment on somebody
22 who is simply on the thin edge anyway ... will generally be
23 sufficient to cause his professional decease. If possible, of
24 course, ruin him utterly." This article was never cancelled by
25 Hubbard.

26 28. Hubbard's policy of 15 August 1960, "Dept of Govt

27 ⁹Meter or E-meter - Hubbard's electrometer. A skin
28 galvanometer which registers changes in the skin's temperature and
moisture.

Affairs," attached hereto as Exhibit 11, states: (3) Make enough threat or clamor to cause the enemy to quail ... (6) If attacked on some vulnerable point by anyone or ... any organization, always find or manufacture enough threat against them [emphasis added] to cause them to sue for peace. Don't ever defend. Always attack. Don't ever do nothing. Unexpected attacks in the rear of the enemy's front ranks works best." This policy was never cancelled by Hubbard.

29. Hubbard policy of 25 February 1966, "Attacks on Scientology," attached hereto as Exhibit 12, states, Scientology must respond to attacks by "... attacking the attackers only. NEVER agree to an investigation of Scientology. ONLY agree to an investigation of the attackers. This is the correct procedure: (1) Spot who is attacking us. (2) Start investigating them promptly for FELONIES or worse using our own professionals, not outside agencies ... (4) Start feeding lurid, blood, sex, crime, actual evidence on the attackers to the press. Don't ever tamely submit to an investigation of us. Make it tough, rough on attackers all the way.... There has never yet been an attacker who was not reeking with crime. All we had to do was look for it and murder would come out." This policy was never cancelled by Hubbard.

MISREPRESENTATIONS ABOUT FAIR GAME.

30. Miscavige brought up Hubbard's policy on the "FAIR GAME LAW" in his February 17, 1994 declaration attached hereto, page 39, saying there would be no "Fair Game" retaliation on Vaughn and Stacy Young who, like my husband and me, are speaking out about CSI. This is false.

31. The first Hubbard policy on "Fair Game" was printed 1st

1 March 1965, "JUSTICE SUPPRESSIVE ACTS SUPPRESSION OF SCIENTOLOGY AND
2 SCIENTOLOGISTS THE FAIR GAME LAW," attached herein as Exhibit 13. It
3 states: "By FAIR GAME is meant, without rights for self, possessions
4 or position, and no Scientologist may be brought before a Committee
5 of Evidence or punished for any action taken against a Suppressive
6 Person¹⁰ or Group during the period that person or group is "fair
7 game ... Such Suppressive Acts include ... 1st degree murder, arson,
8 disintegration of persons or belongings not guilty of suppressive
9 acts (emphasis added)..." Hubbard thus gave Scientologists carte
10 blanche to commit criminal acts against anyone declared a
11 suppressive person. Despite Scientologists' protestations that the
12 policy does not exist or never existed, I was a student at Saint
13 Hill Manor, England in late 1965 when I was required to study it.

14 32. These Hubbard policies are not philosophical. They are
15 functional; they are the guide to how CSI and RTC operate, how the
16 GO operated, and how its successor, Office of Special Affairs
17 ("OSA"), a division of CSI, operates.

18 33. After the policy's distribution, there was so much media
19 and public outcry against it, that Hubbard revised it and deleted
20 the underlined phrase above. The most recent revision, Hubbard
21 Policy of 23 December 1965 revised 8 January 1991, "SUPPRESSIVE ACTS
22 SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS," attached hereto as
23 Exhibit 14, bears little similarity to the earliest 1 March 1965
24 edition.
25
26

27 ¹⁰Suppressive Person - Hubbard's term for someone who
28 continually sins, who messes up everything and everyone, and who is
psychotic or insane. The term is also used for critics of
Scientology.

34. A further Hubbard policy ordered upper level OT¹¹ graduates to commit criminal acts on suppressive persons. It is, "O.T. REGULATIONS," of 30 September 1966, attached hereto as Exhibit 15. It states, "No Operating Thetan may engage in a suppressive action against any person, state or country in the absence of an ... Ethics Order¹² labeling the person, state or country suppressive. Such orders must be obtained beforehand." This policy was never cancelled by Hubbard.

35. A later Hubbard policy of 18 October 1967, "PENALTIES FOR LOWER CONDITIONS¹³," attached hereto as Exhibit 16, states: "SP Order. Fair Game. May be deprived of property or injured by any means by any Scientologist without any discipline of the Scientologist. May be tricked, sued or lied to or destroyed." This policy was never cancelled by Hubbard.

36. The action of declaring people suppressive persons still continues in all Scientology Organizations.

MISREPRESENTATIONS ABOUT THE CANCELLATION OF FAIR GAME.

37. Scientologists argue interminably that Hubbard's "Fair Game" policy was cancelled in 1968 and again later, that it never existed, that because it doesn't appear in the 1991 policy manuals it doesn't exist, and more. A review of "Fair Game" cancellations

¹¹OT - also Operating Thetan (spirit or soul). The highest state there is according to Hubbard. A real OT has no reactive mind and is cause over matter, energy, space, time and thought and is completely free; he can exist with or without a body.

¹²Ethics Order - a printed order on gold colored paper which convenes an investigation or disciplinary court, or which contains the resulting disciplinary actions ordered.

¹³Conditions - states of existence, in this case showing whether the person is successful or not. Each 'condition' contains a formula for application which, if done correctly, is supposed to increase the person's success.

1 shows this is false.

2 38. Hubbard policy of 21 October 1968, "CANCELLATION OF FAIR
3 GAME," attached hereto as **Exhibit 17**, a key policy quoted by
4 Scientologists as purportedly cancelling "FAIR GAME," in fact
5 upholds the "Fair Game" treatment of suppressive persons with
6 criminal acts. It states, "The practice of declaring people FAIR
7 GAME will cease. FAIR GAME may not appear on any Ethics Order. It
8 causes bad public relations. This P/L does not cancel any policy on
9 the treatment or handling of an SP" (emphasis added). This meant
10 that a declared suppressive person or SP was still subject to the
11 practice and acts ordered by "Fair Game." He just was not labelled
12 "Fair Game" anymore.

13 39. An affidavit written by Hubbard on March 1976, attached
14 hereto as **Exhibit 18**, though claimed by Scientologists to cancel
15 "FAIR GAME," fails to do so.

16 40. An 8 June 1979, order titled, "DECLARE," attached hereto
17 as **Exhibit 19**, quotes Hubbard's "Fair Game" policy of 23 December
18 1965 and the words "THE FAIR GAME LAW." This was well after any
19 Hubbard "cancellations."

20 41. In a 16 December 1980 "Sentencing Memorandum of the United
21 States of America," attached hereto as **Exhibit 20**, US Attorney Ruff
22 and US Assistant Attorneys Banoun, Hetherton and Winfree wrote that,
23 "the fair game policy continued in effect well after the indictment
24 in this case and the conviction of the first nine co-defendants.
25 Defendants claim that the policy was abrogated by the Church's Board
26 of Directors in late July or early August, 1980, only after the
27 defendants' personal attack on Judge Richey." (Sentencing
28 Memorandum, page 16 footnote)

42. Several Courts found that CSI continued applying the "Fair Game" doctrine beyond any time the Church said it was cancelled, such as Judge Breckenridge in his decision of June 22, 1984, in Church of Scientology of California vs Gerald Armstrong, specifically pages 8, 11 and 13, attached hereto as **Exhibit 21**.

43. A further purported "Fair Game" cancellation of 22 July 1980, "ETHICS CANCELLATION OF FAIR GAME, MORE ABOUT," attached hereto as **Exhibit 22**, also did not conceal the practice. It wasn't even written by Hubbard but by "The Boards of Directors of the Churches of Scientology," so, by Hubbard's own rules quoted in paragraphs 16 to 21, this "cancellation" did not have the authority to cancel Hubbard's "Fair Game" policy.

44. That "Fair Game," including criminal action and massive financial fraud continue and which implicates Miscavige himself, occurred in San Francisco, on 17 October 1982.

44a. Seven top Scientologists held a conference of United States Mission Holders¹⁴ in the San Francisco Hilton Hotel. They were Miscavige, Norman Starkey ("Starkey"), Marc Yager ("Yager"), Lyman Spurlock ("Spurlock"), Ray Mithoff ("Mithoff"), Guillaume Lesevre ("Lesevre") and Steve Marlowe ("Marlowe"), attached hereto in **Exhibits 23 and 24**.

44b. **Exhibit 23** shows the seven men at a table with Starkey talking at the microphone. Miscavige is behind the microphone, looking up at Starkey. They are all in Sea Org Officer uniform, with lanyards and service ribbons. Miscavige was a Commander, Starkey a Commander, Yager a Captain, Spurlock a Warrant Officer,

¹⁴Mission Holder - a Scientologist who owns a mission or franchise of CSI, and which offers basic, lower level auditing and training to the public at large.

1 Lesevre a Captain. Mithoff and Marlowe, who worked in the non-
2 profit RTC, were both Commanders.

3 44c. The United States Mission Holders, with whom they were
4 interacting, were licensed by a separate entity, Scientology
5 Missions Int. ("SMI"), operating within the non-profit CSI's
6 corporate structure.

7 44d. The announced conference purpose was to make the Mission
8 Holders unquestioningly compliant. Miscavige personally declared at
9 least one Mission Holder a suppressive person, attached hereto as
10 **Exhibit 25**, and said criminal charges were filed against him.
11 This constituted the practice of "Fair Game." The conference
12 resulted in massive intimidation and belittling of Mission Holders.

13 44e. What **Exhibits 23, 24 and 25** do not show, but what occurred
14 in fact was an utter abandon of corporate integrity. The majority
15 of these Officers held full time positions in the for profit AUTHOR
16 SERVICE, INC. organization, yet represented themselves as non profit
17 CHURCH OF SCIENTOLOGY INTERNATIONAL members and SEA ORG OFFICERS as
18 well. (1) All seven men worked in tandem during this conference;
19 (2) All seven men wore full Sea Org uniform and were introduced by
20 their Sea Org ranks;
21 (3) Miscavige and Starkey held full time positions in the for profit
22 ASI; Miscavige as ASI Chairman of the Board since March 1982 and
23 Starkey as ASI Chief Executive; (4) Spurlock held a full time
24 position in the for profit ASI as Corporate Affairs Director. (5)
25 ASI supposedly acted as agent for Hubbard's fictional works, but in
26 reality it was running the non-profit CSI and RTC, attached hereto
27 as **Exhibit 26**, in trial testimony of Homer Schomer in JULIE
28 CHRISTOFFERSON TITCHBOURNE vs. CHURCH OF SCIENTOLOGY, et al., pages

1 3598, 3605, 3607-8. (7) Marlowe, Lesevre and Mithoff were the only
2 three who wore Sea Org Officer uniforms validly - they were
3 Inspector General RTC, Executive Director Int. CSI, and Senior Case
4 Supervisor Int. CSI respectively at the time, both RTC and CSI being
5 non-profit corporations.

6 44f. What is also not seen in Exhibits 23, 24 and 25, is that
7 the Mission Holder Conference was held to perpetrate an enormous
8 financial fraud and scam on CSI and individual Mission Holders, and
9 was done with the full knowledge and participation of Miscavige,
10 others present as well as Hubbard as follows:

11 (1) Through massive intimidation and coercion ("Fair Game"), the
12 wealthy and independent Mission Holders were forced to pay huge sums
13 of money through CSI to ASI; (2) ASI funnelled the money through a
14 Liberian shell corporation, Religious Research Foundation, and
15 through Canada, into Hubbard's private bank accounts in Luxembourg
16 and Lichtenstein; (3) During only part of 1982, over forty million
17 dollars from the non-profit CSI was funnelled through the for profit
18 ASI into Hubbard's personal bank accounts, attached hereto as
19 Exhibit 26, according to trial testimony of Homer Schomer in JULIE
20 CHRISTOFFERSON TITCHBOURNE vs. CHURCH OF SCIENTOLOGY, et al., pages
21 3609, 3611, 3614-3620, 3629-3630.

22 44g. This is only the tip of the iceberg concerning corporate
23 integrity violations, which were standard operating procedure with
24 Hubbard and which he passed on to his followers. Scientology
25 management cannot succeed without such violations ... Hubbard's
26 policies and procedures, only some of which mandate the authority
27 and independence of Boards and Executive Directors, do not, in the
28 main, tolerate this in practice.

1 44h. Miscavige's attempts to portray himself, CSI, RTC and ASI
2 as having clean hands since the "demise" of the GO in 1981 are thus
3 blatantly false, attached hereto as Exhibits 23, 24, 25, and 26,
4 according to trial testimony of Homer Schomer in JULIE
5 CHRISTOFFERSON TITCHBOURNE vs. CHURCH OF SCIENTOLOGY, et al., pages
6 3652 and 3659.

7 45. Hubbard was Miscavige's role model. Hubbard purportedly
8 signed an "Agreement" on September 15, 1966, regarding his
9 resignation, "from all directorships of Church of Scientology
10 effective September 1, 1966." I purportedly witnessed the
11 agreement and signed it, "Hana Eltringham," my former name, attached
12 hereto as Exhibit 27. The Agreement is false. In September 1966,
13 I was a student auditor at Saint Hill, England, completing Class 7
14 auditor interne requirements in order to join my husband, Guy
15 Eltringham, in Los Angeles. I was a nobody. Up to that time, I
16 never met or spoke with Hubbard. I signed the Agreement either on
17 board the "Avon River" or the "Royal Scotman" between August 1967 up
18 to March 1969, when I was still a rising star in Hubbard's personal
19 entourage.

20 46. "In 1983 and 1992, CSI printed and distributed two
21 publications, each containing hundreds of Scientology and Sea Org
22 members names who were declared suppressive persons. They are SO ED
23 2192 INT (Sea Org Executive Directive 2192 International) of 27
24 January 1983, "LIST OF DECLARED SUPPRESSIVE PERSONS" containing
25 approximately 570 names, attached hereto as Exhibit 28. And FLAG ED
26 2830RB (Flag Executive Directive 2830RB) of 25 July 1992 containing
27 approximately 415 groups and 2,230 individuals, attached hereto as
28 Exhibit 29. Both my husband's and my name appear on these lists.

1 47. Arguing whether "Fair Game" is cancelled or not is the
2 wrong issue. Scientologists continuously deny that Hubbard meant
3 what he wrote in his first policy on "Fair Game." Hubbard does the
4 same in his March 1975 Affidavit, attached herein as Exhibit 18. If
5 so, why do Scientologists continue to practice "Fair Game?"

6 48. The record clearly shows that "Fair Game" continues. It
7 is replete with harassment after harassment of current day critics,
8 per paragraphs 64 through 93. It, and the other Hubbard policies,
9 are the criminal legacy Hubbard passed onto his blindly loyal
10 followers.

11 49. Further, if Hubbard's "Fair Game" policy was really
12 cancelled and remains cancelled in the present, why weren't all the
13 other Hubbard "fair game type" policies stricken out of the record
14 long ago? Why are they reprinted in the 1991 Policy and Bulletin
15 manuals?

16 50. It must be noted that this Court is not immune to the
17 "Fair Game" treatment meted out by Scientologists to courts in the
18 recent past. Some of these abuses are documented in the 1980
19 article, "Scientology's War Against Judges" attached hereto as
20 Exhibit 30, and the 1993 article, "Churches Litany of Lawsuits,"
21 attached hereto as Exhibit 31. CSI's personal attack on Judge
22 Ritchie is attached hereto in Exhibit 20, page 16 footnote. Another
23 example is that of Judge Ideman as outlined in his declaration of 17
24 June 1993, attached hereto as Exhibit 32.

25 51. All Hubbard's works, including "Fair Game," constitute
26 CSI's sacred scripture, attached hereto as Exhibit 33, page 24,
27 "Scriptures: In the Scientology religion, the scriptures are all the
28 spoken and written words of L. Ron Hubbard. The scriptures include

1 millions of written words contained in books, films, various forms
2 of issues, and writings and several thousand tape recorded
3 lectures."

4 52. This is the Hubbardian mindset which directed the criminal
5 acts of the now-defunct GO, and which continues to direct the acts
6 of all Hubbard's corporations today, both profit and non-profit.

7 53. I experienced this in 1968, when both the "Avon River,"
8 the ship I captained at the time, and the "Royal Scotman,"
9 Hubbard's Flag ship, were in Bizerte, Tunis, in North Africa. Two
10 Sea Org Officers and I spoke on the dock one evening. They were both
11 flying out the next day to Los Angeles, on a Hubbard assignment.
12 They told me that Hubbard ordered them to shoot up Jack Horner, who
13 lived in Los Angeles, a suppressive person whom Hubbard had
14 personally declared some years earlier. Both men had hand guns and
15 would travel with them. They left ... and then returned some weeks
16 later. After their debrief they told me that Horner had indeed been
17 shot at multiple times, while he and his family were in their home
18 one evening. Fortunately, no one had been hurt.

19 THE CURRENT DECLARATIONS ARE A LAST DITCH EFFORT TO REWRITE HISTORY.

20 54. Scientologists, knowing their vulnerability to a motion
21 for costs, attorneys' fees and sanctions based on bad faith
22 litigation tactics and use of litigation for improper purposes, are
23 attempting to rewrite Hubbard's criminal policies. One documented
24 example is Hubbard's 1955 Article, "The Dissemination of Material."
25 It states, "The purpose of the suit is to harass and discourage
26 rather than to win. The law can be used very easily to harass, and
27 enough harassment on somebody ... will generally be sufficient to
28 cause his professional decease. If possible, of course, ruin him

utterly." It appears in the Technical Bulletin Volumes printed in 1976, attached hereto as **Exhibit 10**.

55. Despite policy which forbids Hubbard's writings being changed except by himself, the same article appeared without the quote in a 1986 Impact Magazine, after Hubbard's death, attached hereto as **Exhibit 34**. In the 1991 edition of the Technical Bulletin Volumes, the article also appears without the quote, attached hereto as **Exhibit 35**.

56. That Scientologists and the general public only see the watered down version since 1986, does not negate or minimize the validity of the original Hubbard order.

57. Nor does it prevent CSI from continuing to silence its critics by the misuse of the litigation process. OSA, a division of CSI, attached hereto as **Exhibit 36**, is the entity which took over from the infamous GO, as stated in an 18 May 1986 letter from OSA staff member, Lela, to Mike Meyers, attached herein as **Exhibit 37**. It states, "Dear Mike: Seven years ago you had some interest in USGO (the United States Guardian Office.) This group is now called Office of Special Affairs ..."

58. OSA is the entity responsible for carrying out "Fair Game" on critics and suppressive persons, and injuring, tricking, suing, lying or destroying them. It gathers overt and covert data on critics and enemies and runs overt/covert operations against them. It directs all litigation activities.

59. In his Memorandum of Points and Authorities filed on February 16, 1994, filed herein, Jonathon Lubell tries to portray the injustice of five CSI entertainers, Charles Durning, Kelly Preston, Maxine Nightingale, Juliette Lewis and Isaac Hayes, all

1 non-parties to the litigation, being served with subpoenas, (J.
2 Lubell Memorandum of Points and Authorities, page 1 & 30), that
3 discovery has been extensive, abusive and is a harass-to-default
4 strategy (J. Lubell Memorandum of Points, pages 4 & 5), that
5 deposition questions were abusive, irrelevant and harassing (J.
6 Lubell Memorandum of Points, page 10), and that the deponents have
7 no relevance to the case (J. Lubell Memorandum of Points, page 14).

8 60. Kendrick Moxon, CSI attorney, in his Declaration of
9 February 14, 1994 filed herein, accuses Geertz's counsel of improper
10 and abusive discovery tactics and seeking to provoke disputes and
11 incite hostility (K. Moxon declaration pages 2 & 18).

12 61. Miscavige, in his Declaration of February 17, 1994, filed
13 herein, protests he is accused of evading service (D. Miscavige
14 declaration page 2), that he never received a subpoena (see D.
15 Miscavige declaration page 8), and, that by attending the Corydon
16 vs. CSI deposition, he was rewarded by being served with subpoenas
17 in disrelated matters (Miscavige declaration page 9).

18 62. The truth is these tactics are common litigation practice
19 by CSI attorneys and related personnel. They are sourced in
20 Hubbard's policies and bulletins, attached hereto as **Exhibits 8 to**
21 **16**, as they were in the heyday of the defunct GO. Their compliance
22 in the present is unquestioningly demanded just as it was then.

23 **PERSONAL EXPOSURE TO "FAIR GAME" TACTICS.**

24 63. My husband and I became well acquainted with "Fair Game"
25 tactics over the past seven years. We work with families who have
26 a loved one in CSI, and at their request, conduct voluntary
27 interventions during which the loved one can obtain information to
28 make a more informed choice about his affiliations. Because of

1 this, Mr. Moxon and other CSI lawyers and hordes of their P.I.s and
2 agents have repeatedly tried to prove; (1) we are kidnappers, (2) we
3 are deprogrammers, and forcibly, physically and mentally assault and
4 harm and injure Scientologists, (3) we are agents of cult awareness
5 groups; (4) we kickback to such groups, (5) and much more. Despite
6 all their posturing, neither CSI, RTC or any other Scientology
7 organization has presented one bit of evidence to back their
8 allegations. Why? Because we do not do the actions of which they
9 accuse us.

10 64. In 1986, P.I. Al Bei of Ingram Detective Agency, called
11 upon Jerry's elderly father in New Mexico, falsely representing
12 himself as a Federal Investigator, saying that Jerry's father could
13 answer questions about Jerry then and there or else be subpoenaed to
14 answer the questions in a California court. Al Bei also divulged
15 personal information about Jerry to his father which could only have
16 come from Jerry's confidential priest-penitent CSI preclear folder.
17 Attached hereto as **Exhibit 38**.

18 Jerry's sister also wrote a report on the incident, attached hereto
19 as **Exhibit 39**.

20 65. In 1989, a CSI front group in Glendale, SMS, found a bomb
21 threat note in their men's washroom, attached hereto as **Exhibit 40**.
22 My husband's name was one of ten top suspects. Don Yaeger, an
23 Investigator for the Glendale Fire Department, and Dan Becker, a
24 P.I. assisting Yaeger, were in possession of a sample of my
25 husband's printing - the bomb threat was hand printed. It did not,
26 though, match my husband's printing. We took the opportunity to
27 educate both men on CSI's "Fair Game" tactics and harassment
28 operations, such as the false bomb threat manufactured by

1 Scientologists against New York freelance writer, Paulette Cooper,
2 who was a very vocal Scientology critic in the 1970s and the years
3 of unmitigated harassment they dealt her, attached here to as
4 **Exhibit 41**, (transcript of Cooper's testimony in the 1984
5 Clearwater, Florida, hearings into CSI).

6 66. Over five years, CSI (at least) has compiled dossiers of
7 spurious information on my husband and me. They are evolving
8 documents, sometimes distributed as a dossier on each of us,
9 sometimes as one on both of us. The latest edition is attached
10 herein as **Exhibit 42**.

11 67. Since 1991, innumerable copies have been handed in person
12 or mailed to our friends, colleagues, associates, and even people we
13 do not know in the USA, England and Australia.

14 68. In November 1993, my husband and I attended a Cult
15 Awareness Conference in Minneapolis. I found dossiers about me in
16 the ladies washroom. Dossiers about my husband were found in the
17 men's washroom. Scientologists handed copies of the packs to
18 conference attendees.

19 69. In 1991, someone impersonating my husband called American
20 Express and obtained three months worth of our statements. In 1992
21 someone called inquiring into other credit cards. In 1993 the same
22 occurred.

23 70. Repeated attempts were made for more than five years to
24 obtain our phone account information, and failing that, to determine
25 what calls we make to certain area codes at certain times.
26 (Someone was trying to find out which phone numbers we called long
27 distance, and therefore which families we were working with.)

28 71. Between 1991 and 1993, at least fifty of our family

1 members, friends, acquaintances and associates, including people we
2 did not know up to that point, were phoned or visited by CSI hired
3 Private Investigator John J. Gaw, and at times other P.I.s, asking
4 questions about us, our backgrounds, families, education, work and
5 clients and making false and/or derogatory innuendos. The P.I.s
6 used many "fronts," such as: (1) they needed a deprogrammer to get
7 their Scientology child out of the group; (2) we owed an East Coast
8 client a lot of money and refused to pay him or take his calls; did
9 the person know whether we had other disgruntled clients? (3) they
10 needed a deprogrammer and were the Whitfields any good; (4) and many
11 more.

12 72. During 1991, in England, we worked with a family whose son
13 was a Scientologist. Someone impersonating my husband's elderly
14 father called an English friend begging and pleading for our phone
15 number in England, saying it was a matter of great urgency. Our
16 friend finally gave the number, thinking the caller was genuine.
17 Within hours, our Bed & Breakfast was surrounded by at least five
18 cars driven by Scientologists. We were under heavy P.I.
19 surveillance from then on. The P.I.s photographed us from their
20 cars as well as their second floor stake-out room in the Bed &
21 Breakfast across the road. The P.I.s room contained expensive
22 surveillance equipment aimed at our Bed & Breakfast twenty four
23 hours a day. The surveillance continued around the clock for a week.
24 Our landlady was followed when she went shopping. The head of OSA,
25 a division of CSI, in England, Ms. Barbara Bradley, told the police
26 that my husband and I had kidnapped and were holding two people
27 against their will in our Bed & Breakfast. The police investigated.
28 They found the report false.

1 73. In August 1991, my husband was subpoenaed in, Friend vs.
2 Church of Scientology International. Even though my husband never
3 met or spoke with Roxanne Friend and provided a declaration to that
4 effect, he was the first person to be subpoenaed, attached hereto as
5 Exhibit 43.

6 74. In late 1991, someone called a friend of ours in England,
7 long distance. The person, identifying himself only as an
8 interviewer from a New York TV station, said he was calling urgently
9 for Hana Whitfield and needed to know my phone number and location
10 in England. No one in a New York or other American TV station knew
11 I was in England. (Someone was trying to locate us and find out
12 which family we were working with.)

13 75. We receive many phone calls from families requesting
14 information on Scientology and assistance. We learned rapidly to
15 determine which calls were genuine and which were not.

16 76. We were under surveillance for months on and off. In 1993
17 I had three to five cars, as well as two people on motor bikes,
18 monitoring me all at the same time. We were photographed and video
19 taped innumerable times and also covertly tape recorded many times.

20 77. P.I. John Gaw filed a complaint with the Board of
21 Behavioral Science Examiners in Sacramento, attached hereto as
22 Exhibit 44, that we practice counseling or interventions without a
23 license. We don't counsel, now have we ever called ourselves
24 counsellors. Nothing came of the report.

25 78. The Zoning Commission said our neighbors were complaining
26 because there were too many people visiting our home. We have very
27 few visitors, a friend now and then, and are on extremely good terms
28 with our neighbors. So we knew the complaint was false.

1 79. Scientologists falsely defamed my husband as a child
2 beater, a wife beater, a drug dealer, addict and thief. They
3 falsely accused him of "stealing" Narconon, a CSI front group and
4 drug treatment center, attached in Exhibit 42, page 1.

5 80. Scientologists accuse me of potential violence because I
6 took Prozac. However, what it did was help resolve the chronic,
7 debilitating depression and mental "fragmentation" brought on by
8 Hubbard's dangerous auditing techniques and CSI's intense high
9 demands, duress and manipulations.

10 81. We were repeatedly called kidnappers and deprogrammers and
11 accused of "brutally ripping peoples' beliefs from their minds," in
12 CSI publications and on TV and radio programs.

13 82. In 1992 we were sued for "false imprisonment," attached
14 hereto as Exhibit 45, by Scientologist Casillas ("Casillas"), who
15 ran surveillance on my husband and me for days. An LAPD Officer
16 stopped Casillas for driving without a license plate and cuffed him
17 while he checked Casillas and the car. Casillas was then released,
18 attached hereto as Exhibit 46. The result? We were sued.

19 83. On March 14, 1993, the CSI law firm Bowles & Moxon, flew
20 a young man, Curtis Harmon; from Seattle, Washington State, to Los
21 Angeles to depose him. (Earlier, my husband, I and Mr. Harmon,
22 arranged an intervention after which Curtis left CSI.) Eugene
23 Ingram, a CSI P.I., told Curtis that unless Curtis agreed to be
24 deposed, he would lose his relationship with his Scientology mother.
25 So Curtis went through ten hours of video deposition in which he was
26 asked the same questions repeatedly. Afterwards, he was given an
27 affidavit, attached hereto as Exhibit 47, which drafted and typed
28 for Curtis' signature. It contained statements contrary to those he

1 said in the deposition, but, because he was exhausted and afraid of
2 losing his mother, he signed. On the 23rd March, Curtis wrote a
3 second affidavit in Seattle to correct the first, attached hereto as
4 **Exhibit 48**, stating, "... I was asked the same question over and
5 over in many different ways until I agreed to one small part of what
6 they were talking about, but then it would be twisted to fit what
7 they wanted to hear. Even when I would say I didn't really remember
8 or didn't really know for sure, it would end up in the Affidavit
9 anyway." (C. Harmon affidavit of March 23, 1993, page 1).

10 84. On April 13, 1993, my husband and I were served with two
11 subpoenas each in the CSI vs. IRS case, and the Kevin Harness vs.
12 Cult Awareness Network, et al., In Re: CAN Coordinated Cases,
13 attached herein as **Exhibit 49**. The two subpoenas were handed to
14 each of us three times that day by three different people, once in
15 Logan Airport, Boston, by an OSA staff member, Jane Parker, a second
16 time by a man as we waited to board our plane, and the third time by
17 Scientologist Andrew Bagley and another man after we arrived at LAX
18 airport. My husband and I were non parties.

19 85. Sometime in May 1993, I was served with a subpoena in the
20 (Scientologist) Philip Hart vs. Cult Awareness Network case. On May
21 4, 1992, our attorney filed a protective order, attached herein as
22 **Exhibit 50**, Protective Order of 4 May 1992, pages 4
23 to 9.

24 86. Miscavige claims in his February 17, 1994 declaration that
25 he was "rewarded (after deposition in Corydon vs. CSI) by having
26 plaintiff's counsel serve me with various subpoenas in other
27 disrelated matters." CSI did the same to my husband and me. In
28 June 1993, we were deposed by CSI lawyer K. Moxon in a CSI vs. IRS

1 case. We were non parties. The questions were irrelevant,
2 harassing and went into irrelevant issues. Moxon then served us
3 with subpoenas in another unrelated case.

4 87. On June 25, 1993, I was deposed in a second CSI vs. IRS
5 case - I don't know title or number. I was a non party.

6 88. On June 30, 1993, my husband and I were deposed in the
7 Harness vs. Cult Awareness Network combined case as non-parties.
8 Neither my husband nor I know Mr. Harness.

9 89. During the latter half of 1993, I and my husband were
10 served with subpoenas in the Emery Wilson Corporation DBA Sterling
11 Management Systems vs. Cult Awareness Network Et Al as non-parties.
12 Due to harassment my husband experienced in his deposition, our
13 attorney filed a Protective Order for me, attached herein as **Exhibit**
14 **51**, because my husband was subjected to extensive harassment
15 regarding not only our intervention activities but also our
16 confidential financial affairs and associations, even though the
17 court ordered all allegations about deprogramming and exit
18 counselling to be stricken. None of the questioning was
19 discoverable as a matter of right. It was clear we were being
20 sought for an improper purpose.

21 90. In September 1993, I learned of further "Fair Game" and
22 harassing tactics initiated by CSI and RTC against me because I am
23 a Scientology critic. John Richardson ("Richardson") of Premiere
24 Magazine, wrote that Marty Rathbun, RTC Inspector General for
25 Ethics, and Heber Jentzsch, CSI President, claimed I was an
26 accomplice in the tragic murder of my father 30 years ago, attached
27 hereto as **Exhibit 52** of September 1993, page 91. This is blatantly
28 and completely false.

1 91. In early November 1993, my husband and I attended a Cult
2 Awareness Convention in Minneapolis. Three Scientologists, Carly
3 Swirtz, Jane Parker (OSA staff) and Jennie Walker, handed out
4 earlier versions of the spurious dossier on my husband and me,
5 attached hereto as **Exhibit 42**.

6 92. In 1993, groups of people, among them Scientologists,
7 demonstrated outside our home in Silverlake, Los Angeles, waving
8 placards stating "Hate Mongerers [sic] get out of Silverlake" and
9 "Stop religious bigotry." They handed leaflets, attached hereto as
10 **Exhibit 53**, to neighbors and passers by, which say, "WHICH HUSBAND
11 AND WIFE TEAM BREAKS UP FAMILIES FOR \$1,500 A DAY?" and then give
12 our names. They falsely state that we are violent kidnappers, our
13 actions are terroristic, that I tried to kill my father with a gun
14 then changed my name and fled South Africa.

15 93. These actions are the practices of "Fair Game." They show
16 that Hubbard's "Fair Game" doctrine is alive despite supposed
17 cancellations, and is practiced by CSI and RTC.

18 94. CSI lawyer, Jonathon Lubell, says in his February 16, 1994
19 Memorandum of Points and Authorities, attached herein, that CSI
20 religious tenets and scriptures have been assailed (page 2), that
21 certain religious writings called upper level materials are held to
22 be strictly confidential as a matter of religious precept (page 12),
23 that there is a precise path to spiritual freedom that one walks one
24 step at a time (page 13), non-party entertainers who have not
25 achieved this level will be at risk (page 14).

26 95. CSI lawyer, Tim Bowles, states in his February 16, 1994
27 declaration that the insertion of altered or recreated versions of
28 CSI's upper level scriptures into the court record would violate the

1 religion's deep belief that such are confidential (page 5).

2 96. Both the above statements are invalid and attempt to cloud
3 the Courts perception of these upper level scriptures or materials.

4 The upper levels start at Operating Thetan One, or OT 1, and
5 advance up through OT 8. They are strictly confidential within CSI.
6 A Scientologist can only get onto a higher OT level by
7 satisfactorily completing the earlier one and paying for the next
8 one.

9 97. OT 1, in summary, consists of walking around and observing
10 one's surroundings in different ways so as to familiarize oneself,
11 as a new "Clear," to one's environment.

12 98. OT 2, attached hereto in part as **Exhibit 54**, consists of
13 running out or deleting past life "implants"¹⁵.

14 99. OT 3, attached hereto in part as **Exhibit 55**, of all the OT
15 levels, attracts the most criticism. It consists of telepathically
16 locating "body thetans"¹⁶, also called BTs, which are stuck to one's
17 body. Each BT is then individually audited on techniques to erase
18 the implants it forcibly received 75 million years ago from a
19 despotic ruler named Xemu (sometimes spelt Xenu). Hubbard called OT
20 3 the "Wall of Fire, attached hereto as **Exhibit 56**, pg 2. The BT
21 then leaves and goes on its way or reincarnates into its next life
22 as a human being. The next BT is then located and audited until it
23 leaves ... and so on. Each person has hundreds of thousands of BTs

24 ¹⁵Implants - artificial and false concepts and purposes which
25 were intentionally installed into people up to trillions of years
26 ago (see OT II DATA SHEET and pages 9, 10 and 11) through force and
pain so as to control and suppress people them.

27 ¹⁶Body Thetan - also called BT. A body thetan, or a BT, is a
28 spirit or soul attached to the surface of one's body or inside
one's body. Every man, woman and child has hundreds of thousands
of BTs attached to his or her body and inside it as well.

1 on his body and inside it. Ridding oneself of concentrated
2 quantities of BTs is akin to performing a religious practice of
3 exorcism on oneself.

4 100. OT 4 through OT 7 consist of exorcising more lawyers of
5 BTs, though each new OT level utilizes different techniques.

6 98. Having seen CSI's OT levels printed in publications like the
7 Los Angeles Times, the Washington Post and books, I can verify that
8 they are Hubbard's exact upper level materials as written by him and
9 which I audited from 1968 onward.

10 101. A significant reversal, a manipulation, occurs in
11 Hubbard's cosmology between the state of Clear and the OT 3 level.
12 As a Scientologist gets to Clear, he learns and believes that all
13 his physical and psychosomatic ills will be eradicated forever. He
14 learns from Hubbard's article, "The State of Clear," that, "A clear
15 can be tested for any and all psychoses, neuroses, compulsions and
16 repressions (all aberrations) and can be examined for any
17 autogenetic (self-generated) diseases referred to as psychosomatic
18 ills. These tests confirm the clear to be entirely without such
19 ills or aberrations. Additional tests of his intelligence indicate
20 it to be high above the current norm," attached hereto as Exhibit
21 57.

22 102. He learns from Hubbard's bulletin, "TECHNICAL BULLETIN OF
23 22 JULY 1956," attached hereto as Exhibit 58, that "We are now
24 capable of solving cases to the extreme level of clear ... We have
25 created the permanent stable clear."

26 103. He learns from Hubbard's 1958 "The Freedoms of Clear,"
27 attached hereto as Exhibit 59, that "In clearing people we achieve
28 four freedoms, and I'll enumerate them for you ... The first one is

1 illness ... Next we have freedom from pain ... The next ... is
2 freedom from ignorance ... a thetan knows everything ... The last
3 part of these freedoms is the most controversial of them all: death
4 (emphasis added)."

5 104. He also learns from Hubbard's 2 April 1965 bulletin, "The
6 Road to Clear," attached hereto as **Exhibit 60**, that, "I have just
7 made a breakthrough in finding what a clear really is ... A clear
8 has no vicious reactive mind and operates at total mental capacity
9 like the first book¹⁷ said. In fact every early definition of CLEAR
10 is found to be correct ... But at its end, MAGIC ... There's the
11 state of clear we've sought for all these years. It fits all
12 definitions ever given for clear."

13 105. He learns from Hubbard's bulletin of 23 August 1966,
14 "CLEAR TEST," that the first Clear, John McMaster, achieved Clear,
15 attached hereto as **Exhibit 61**, and that, "no doubt exists that he
16 has erased his bank¹⁸ completely and its gone."

17 106. He learns from a "GO CLEAR" advertisement, attached hereto
18 as **Exhibit 62**, that "A Clear is a being who can be at cause
19 knowingly and at will over mental matter, energy, space and time as
20 regards the First dynamic¹⁹ ... It is a stable state ... A Clear has
21 over 135 I.Q., a vibrant personality, glowing health, good memory,
22 amazing vitality, self-control, happiness and more." There are many
23

24 ¹⁷first book - This is Hubbard's book, Dianetics The Modern
25 Science of Mental Health, published in May 1950. It has always
26 been known as the first book.

26 ¹⁸Bank - the reactive mind, the storehouse of all one's painful
27 and negative memories.

27 ¹⁹First dynamic - that part of one's life which has to do with
28 self. One's name, identity, likes, dislikes, personality, and so
29 on.

1 more Hubbard claims about Clear.

2 107. However, despite the claims, all Dianetic and Scientology
3 auditing results are temporary, though emotionally fulfilling while
4 they last. Clear is not a permanent state.

5 108. Clears find, to their chagrin, that they hurt again with
6 similar hurts, upsets and problems they had before and they hope
7 that OT 3 will fix them. When they are told that they are at risk
8 until they do OT 3, attached hereto as **Exhibit 63**, they don't
9 realize that OT 3 is Hubbard's excuse for his false claims about
10 Clear.

11 109. It is only after the Clear completes OT 1 and 2 and pays
12 for OT 3 that he can learn what OT 3 is.

13 110. When he reaches OT 3, he finds, usually to his shock and
14 incredulity, that all his physical and psychosomatic problems are
15 caused by BTs and not by engrams in his reactive mind, that every
16 negative thought, problem and upset he has find their origins in the
17 minds of BTs, not in his mind.

18 111. This is Hubbard's most insidious bait and switch. All the
19 way to Clear, the person believes the cause of his upsets and
20 problems was his reactive mind and engrams, and that he will be
21 Clear forever. On OT 3, he suddenly learns that he paid \$6,000 and
22 \$7,000 to find out he is infested with hundreds of thousands of BTs
23 who are the cause of all his ills, and that he must learn to be an
24 exorcist and talk telepathically to demons in order to reach OT 8.
25 Attached hereto as **Exhibit 64**.

26 112. Throughout Hubbard's 1950 book, DMSMH, and later
27 writings, Hubbard repeats that dianetic techniques are not hypnotic.
28 Yet his dianetic auditing procedure from DMSMH clearly shows the

1 technique is hypnotic. Attached per Exhibit 65, pages 42 and 43,
2 from the "HUBBARD DIANETICS SEMINAR" training pack "based on the
3 works of L. Ron Hubbard."

4 113. Hubbard then wrote in his 1952 article, "Danger, Black
5 Dianetics!" that, "Hypnotism is a rather old and untrustworthy
6 method of influencing or enslaving others. However, hypnotism is
7 very unreliable ... The mechanisms of hypnotism ... are
8 circumscribed in Black Dianetics ... Processing ... can undo Black
9 Dianetics unless, of course, the victim has been driven into suicide
10 or past the point of no return - a feat which is not difficult, but
11 a condition which is not desirable where the operator seeks real
12 advantage ... Several people are dead because of Black Dianetics ...
13 Thousands may die because of Black Dianetics ..." Attached hereto
14 as Exhibit 66, pages 519 & 520. 112. Scientologists can't grasp
15 these contradictions because their normal reality checks are
16 'disengaged.' This occurs in the constant application of
17 repetitive and hypnotic techniques in Hubbard's auditing and
18 business management techniques, and the resultant onset of trance
19 states, the wide awake, intensely focused state in mental and
20 physical creativity. . Scientologists have to deny these
21 contradictions in the face of incontrovertible evidence they are
22 correct, because their existence revolves around the one person they
23 trust completely, their authority figure, Hubbard.

24 114. The Scientology "Bridge"²⁰ is also a massive form of
25 financial fraud. Even though the 'services,' the auditing and
26 training, have been promoted for years as being "100% standard

27 ²⁰Scientology "Bridge" - the step by step progress a
28 Scientologist must take from his first auditing action or training
course all the way up to Clear and then further up the "OT" levels.

tech," the same auditing action costs less at a subordinate organization and more at each successively higher level organization. The rationalization used for the price increase is that the higher level organization has better trained auditors, thus less flubs and faster delivery. Scientologists do not see the two sides of that coin .. and that it can't be both ways.

115. In my experience, which is not based on psychological expertise I claim but what I learned from mental health experts and from CSI, it is the bait and switch and the false claims about the techniques, including those on the OT levels, that cause so many upper level Scientologists physical and mental illness and even death.

116. That Hubbard ordered the OT materials to be kept strictly confidential under threat of immense punishment, becomes apparent when one reads them. The OT levels are confidential for the survival of Scientology, not for that of its parishioners. They are confidential because newer and less indoctrinated Scientologists would not believe them. If a Scientologist knew up front that on OT 3 he would, at great cost, enter a science fiction world and telepathically exorcise good and bad BTs for years, he might seek less costly and more conventional help elsewhere.

117. Scientologists argue that premature exposure to the OT level materials will cause anyone, including their parishioners, great physical harm and possibly death. What would really happen is that Scientologists would see Hubbard's doctrine for what it is - patently science fiction and not scientifically valid nor containing observable facts.

118. The OT materials have been in the public domain since the

1 late 1970s. I have never heard or seen reports of large numbers of
2 deaths occurring coincident with the general public reading these
3 materials in publications.

4 119. Hubbard spoon fed Scientologists level by level. There
5 are books and materials on past lives, on out of body and mystical
6 experiences and more, available but these are "teasers" and
7 "mysteries" to keep Scientologists moving along. The big mysteries
8 are the state of Clear and the OT levels.

9 120. In his "Professional Auditor's Bulletin" Number 66 of 25
10 November 1955, attached hereto as **Exhibit 67**, page 2, Hubbard said,
11 "The principle of Mystery is, of course, this: The only way anybody
12 gets stuck to anything is by a mystery sandwich."

13 121. I also heard Hubbard say that, to keep a person on the
14 Scientology path, feed him a mystery sandwich.

15 122. The Scientologists are entitled to any beliefs they wish.
16 It is actually not their beliefs that is the issue. What is the
17 issue is how they act.

18 123. It is CSI's practices, not their beliefs, that were the
19 issue in the past and are still the issue now. For example, in this
20 case it is CSI's practice of telling parishioners and staff members
21 to end their lives so as to promote the greatest good for the
22 greatest number of dynamics²¹, telling parishioners to kill
23 suppressive persons for the same reason according to "Fair Game,"
24 and orchestrating large financial frauds for the same reason and not

25
26 ²¹Dynamics - specifics areas of one's existence. 1st dynamic
27 is oneself; 2nd dynamic is marriage, sex, children; 3rd dynamic is
28 one's group or work; 4th dynamic is mankind; 5th dynamic are the
animal and plant kingdoms; 6th dynamic is all matter, energy, space
and time; 7th dynamic are all spirits; 8th dynamic is God or the
Supreme Being.

1 religious beliefs that are the issue.

2 124. Hubbard's OT 3 materials are skimpy and bring up many
3 questions. Some which I've tried to help OT 3 students resolve are:
4 how do BTs stick to a person lifetime by lifetime if he has a
5 different body each life? how can an electronic ribbon "catch" a
6 body thetan? how are BTs packed into boxes and flown around in
7 airplanes? how come BTs were implanted 75 million years ago on
8 Hawaii and the Canary Islands when these islands did not exist at
9 that time? I audited hundreds of Scientologists through such
10 confusions to complete their indoctrination and accept the materials
11 as valid.

12 125. I talked with many former Scientologists in the last eight
13 years. The majority said they left CSI after getting onto OT 3 and
14 reading the materials, or after getting onto higher OT levels and
15 realizing they contained more BT exorcism techniques. I also talked
16 with many former Scientologists who claim their physical and/or
17 psychological problems started or worsened after getting onto OT 3.

18 CRIMINALS ACCUSE OTHERS OF DEEDS THEY HAVE DONE.

19 126. Miscavige writes in his 17 February 1994 declaration
20 (attached herein) that "[Vaughn] Young has taken a personal tragedy
21 in my family's life, the suicide of my mother-in-law, and attempted
22 to make this an issue in this lawsuit by twisting it to imply non-
23 existent wrongdoing in my past."

24 127. This is the criminal mind talking. Hubbard's bulletin of
25 15 September 1981, "CRIMINAL MIND," attached hereto as Exhibit 68,
26 states, "There is a datum of value in detecting overts²² and
27

28 ²²Overt - a sin, transgression.

1 withholds²³ in criminal individuals: THE CRIMINAL ACCUSES OTHERS
2 OF THINGS WHICH HE HIMSELF IS DOING ... THE CRIMINAL ONLY SEES
3 OTHERS AS HE HIMSELF IS."

4 128. My husband and I have also experienced similar abuses by
5 Miscavige and CSI, including multiple accusations of murder and
6 other crimes which are not based on facts and of which we are not
7 guilty.

8 129. Miscavige took a thirty year old personal tragedy in my
9 family's life and twisted it to imply non-existent and criminal
10 wrong doing on my part, as follows:

11 130. In early 1992, Miscavige, as RTC Chairman of the Board
12 announced to a group of 700 Sea Org members that I murdered my
13 father. He said this at a full staff meeting of the CSI
14 International Headquarters in Gilman Hot Springs, Southern
15 California. Three former high level Scientologists who recently
16 defected, witnessed this. All three defectors told me that
17 Miscavige said I was caught with my hand in the cookie jar and was,
18 at that time, in prison in South Africa serving time for the crime.
19 This is a complete falsehood and fabrication. Not one part of
20 Miscavige's statement is true, except that my father was tragically
21 murdered in 1964 in East London, South Africa, thirty years ago. My
22 older brother, after a life time of incest perpetrated by my father
23 on the children, confessed to the crime and was tried, convicted,
24 sentenced, and served time. I was in Johannesburg at the time of my
25 father's death and had nothing to do with it. Miscavige knows that.

26 131. CSI agents and P.I.s, including my former husband, Guy
27

28 ²³Withholds - A Hubbardian word for sins or transgressions a
person has committed and which he won't talk about.

1 Eltringham (a Scientologist living in Los Angeles), attempted to get
2 the South African Police ("SAP") to re-open my father's murder
3 investigation on the basis that I did it or was an accessory. My
4 elderly and ailing invalid mother, and my brother and his family in
5 Johannesburg, were terribly harassed, to the point of my mother
6 shouting in fear at the 'investigators,' and my niece also screaming
7 in fear at the strange men who came to her father's house late at
8 night with invasive and harassing questions about her father's past.
9 My husband and I had to retain a Johannesburg attorney to defend my
10 family and myself from CSI's and RTC's horrendous "Fair Game" acts
11 and spurious charges. Our Johannesburg lawyer concluded the
12 Scientologists spent well over a year and a fortune on their
13 investigation. However, the SAP recently said the matter is closed
14 as there is no evidence of my complicity. I am awaiting formal
15 notification to this end from them.

16 132. This has not stopped CSI from continuing with its "Fair
17 Game" activities against us. Several days ago, Marcy McShane
18 ("McShane"), the wife of OSA member Warren McShane, who worked for
19 the GO, visited our home unannounced, asking to see Hana, myself.
20 My husband answered the door. McShane proceeded to accuse us of
21 deprogramming and hiding like criminals. She scolded my husband,
22 saying that he had promised to stop giving radio interviews if, as
23 McShane said, "We stopped the murder investigation on Hana in South
24 Africa and stopped demonstrating outside your home." McShane was
25 misinformed. My husband had never made such a promise to anyone at
26 anytime, ever.

1 133. On 7 March 1994, an updated "dead agent"²⁴ dossier reached
2 my husband and me from CSI. It contains additional information
3 about my brother's court case and trial, testimony of witnesses and
4 includes an affidavit reportedly written by a family member which
5 recounts explicit sexual acts ... the document is pornographic.
6 Furthermore, it has nothing to do with me. Additional information
7 is also included about my husband.

8 134. The CSI's actions stem from Hubbard's policies and
9 procedures which order the death of suppressive persons, their
10 unending harassment with "manufactured" evidence if needed, and
11 more.

12 135. Due to the years of unmitigating and shocking "Fair Game"
13 harassment by CSI and RTC of my husband, myself and my family, I
14 experienced overwhelming shock, emotional and physical distress
15 which has caused frequent illness and inability to function and
16 work.

17 136. The following excerpt of Hubbard's taped lecture,
18 "Clearing Methodology" of 13 May 1959, reprinted in 1993 by the
19 Church of Scientology Flag Service Organization in Clearwater,
20 attached hereto as **Exhibit 69**, page 2, applies. It states, "I won't
21 call it privacy because that dignifies it. You have to be willing
22 to invade privacy, very definitely ... when you realize that the
23 highest point of aberration on the third dynamic was the first time
24 you decided not to invade somebody's privacy ... you will see at
25 once where this connects on 8-Cing²⁵ somebody into a service

26 ²⁴Dead agent - the act of blackening and discrediting an
27 enemy's or perceived enemy's name.

28 ²⁵8-Cing - getting someone to do an action regardless of
objection or excuse.

1 zone²⁶."

2 137. It is shocking that Miscavige and Jentzsch, who are
3 protesting the fruits of their own law suit, the particulars which
4 have come to light during its proceedings and their court ordered
5 depositions, would protest their innocence while being guilty of
6 acts to blacken critics' names such as those of Dr. Uwe Geertz,
7 Fishman, Vaughn and Stacy Young and my husband and me.

8 **PSYCHOTIC EPISODES, PTS TYPE III²⁷, SUICIDAL IDEATION AND SUICIDE**
9 **INDUCED BY AUDITING.**

10 138. Raymond Mithoff ("Mithoff"), Senior Case Supervisor Int.,
11 writes in his February 16, 1994 declaration attached herein, "I can
12 ... state that there is no special terminology in Scientology Church
13 scripture for suicide. Suicide is regarded, in church scripture, as
14 an aberration, and any person who has suicidal tendencies is a
15 person who needs help." Mithoff doesn't specify what help is given
16 to Scientologists with suicidal tendencies and who are PTS Type III.
17 Due to my auditor training and experience, I was privy to
18 information about suicides and PTS Type 3s, as was Mithoff, that
19 most Scientologists aren't, so I understand his reluctance in
20 elaborating on these points.

21 139. Hubbard redefined or repositioned mental health terms,
22 including words like "suicide" in his own language and to his own
23 ends. One example of the repositioning of "suicide" is contained in

24 ²⁶Service zone - an area in a CSI organization where auditing
25 training, also known as "services" or "a service" are delivered
26 to people.

26 ²⁷PTS Type III - a term devised by Hubbard to describe insanity
27 or psychosis. When applied to a Scientologist, it means the person
28 is irrational, hat he sees everyone around him as an enemy or
"suppressive" and may be hallucinating and seeing persons and
things that are not present in reality.

Hubbard's taped lecture of 3 January 1960 titled, "CREATE AND CONFRONT," attached hereto as Exhibit 70, pages 93 and 94. Hubbard said the Markab Confederation, a civilization that existed between 19,000 and 40,000 years ago, was so medically advanced that death was eliminated. People received body part replacements instead, ad infinitum. The one sure way to die was to do it oneself, massively, on a speedway or racetrack, which existed for that purpose. Hubbard said, "And so before I used the track for the purpose it was intended, which was knocking off²⁸ a mock-up²⁹, why, I'd get in there and"

Another example is 'PTS Type 3' or 'PTS Type III', in Hubbard bulletin of 24 November 1965, "Search and Discovery," attached hereto as Exhibit 71, pages 701, 703 & 704. Hubbard said, "Type III is beyond the facilities of organizations not equipped with hospitals as these are entirely psychotic ... Type 3 PTS is mostly in institutions or would be. In this case the apparent SP is spread all over the world ... for the person sometimes has ghosts about him or demons and they are just more apparent SPs but imaginary as beings as well. All institutional cases are PTSes. The whole of insanity is wrapped up on this one fact ..." Hubbard's remedy - a safe environment, quiet, rest, no treatment of a mental nature at all, intravenous feeding if required, soporifics (narcotics, sedatives or tranquilizers).

140. According to Hubbard, psychosis, insanity and PTS Type 3 are one and the same.

141. Based on my Scientology experience and what I have learnt

²⁸Knocking off - killing, destroying. A euphemism for suicide.

²⁹Mock-up - an imaginary picture in the mind.

1 from psychology experts, Hubbard's aim in auditing was to push the
2 preclear into his past, make him believe what he found, then push
3 him into his youth ... then his birth experience ... and then ...
4 past lives ... all the while believing that what he sees in his mind
5 is as real as what he sees with his eyes in the material world. In
6 so doing, Hubbard successfully collapsed the factual boundaries
7 between objective and subjective reality.

8 142. Scientologists will adamantly deny this and as adamantly
9 declare that contacting and auditing their past lives and believing
10 what they find, is voluntary. But Hubbard's books, tapes and all
11 Scientology and Dianetic techniques and literature are replete with
12 past lives and mystical experiences.

13 143. The OT levels are the ultimate past life. One audits not
14 just one's own past lives but those of hundreds of thousands of BTs
15 as well. One runs into mass kidnappings, betrayals, exploding
16 volcanoes, decimation of civilizations, mass implanting of body
17 thetans, evil rulers, electronic mountain traps, heroes, earlier
18 universes, parallel universes, between lives implants, the beginning
19 of the cosmos, and more.

20 144. Many Scientologists have difficulty determining whether
21 their past lives are real or imaginary. Hubbard's 24 November 1965
22 bulletin, "Search and Discovery" attached hereto as Exhibit 71,
23 states that the ghosts and demons seen by institutionalized persons
24 are imaginary. But his OT 5 materials state that BTs (who Hubbard
25 said are real) can take on the identity of a ghost or a demon.
26 Attached hereto as Exhibit 72, Bulletin of 17 September 1978, NED
27 for OT Series 6, page 3, "A BT or cluster can go into the valence of
28 a person ... BTs and clusters thinking they are the person ... This

1 is discussed under the heading of "Ghosts" ... Nearly everybody has
2 a ghost if he looks ... "

3 In answer, therefore, to how one will know whether past lives and
4 BTs and clusters are real or not, Hubbard's sole answer is that one
5 will know. As Hubbard is the absolute authority figure,
6 Scientologists' answers are that they will know.

7 145. One question arises - what happens to people who live in
8 a fantasy world which becomes more real to them than the physical or
9 material universe? In which objective reality has become
10 subjective reality, and vice versa? This could be said to happen to
11 people in institutions. This is what happens with every practicing
12 and dedicated Scientologist who starts into auditing and continues
13 on with it.

14 146. A fundamental Hubbard doctrine is the "overt motivator
15 sequence³⁰." It meant that I, and I alone, was responsible for my
16 upsets and problems. It wasn't Hubbard, or the organization, or his
17 techniques ... and never could be. A Scientologist's acceptance of
18 this and other Hubbard's doctrines and policies, assisted the
19 Scientologist in accepting the validity of his subjective reality
20 almost over that of his objective reality.

21 147. An example of this occurred in the early 1980s at the HQ
22 in Clearwater, Florida. A painter from New York was at the HQ
23 getting auditing. While he was in session one day, his small child,
24 under the supervision of a nanny, fell into the pool in the garden
25

26 ³⁰Overt motivator sequence - if Bill does a bad deed to Tom,
27 Bill feels that, (a) something bad will happen to him, or (b) that
28 something bad was already done to him and therefore the bad deed he
did to Tom was justified.

1 and drowned. The painter was told about the tragedy after his
2 session. He was shattered. Instead of an investigation being held
3 into how and why the young child fell into the pool and why it was
4 left there long enough to drown, the only action that was taken with
5 any of the people involved, was to put the father back into an
6 auditing session immediately. He was then audited on what sins or
7 transgressions he had done that caused his young child to drown.

8 148. Based on my Scientology experience and what I learned from
9 mental health experts, most Scientologists undergo vast personality
10 changes. They are completely unaware of it, and will deny it and
11 argue with great conviction against it. But the longer and stronger
12 their adherence, and the more they are steeped in Hubbard's
13 teachings, the deeper and more lasting the changes. Their normal
14 thought patterns, reality checks, logical thought processes,
15 responses and family values they were raised with, are all modified
16 by Hubbard's teachings. They eventually become Hubbard's alter-
17 ego, to the point of chain smoking (Hubbard had bad teeth, nicotine
18 stained dark brown), screaming at subordinates as a routine ... and
19 manufacturing evidence against SPs, inducing parishioners into
20 insanity, holding people against their will, denying people
21 professional treatment, ordering parishioners to kill SPs and
22 themselves, and orchestrating large financial frauds.

23 149. Considering the numbers of Scientologists who were ill
24 despite repeated 'PTS handlings,' those on whom the techniques did
25 not work, those who had interminable case problems and who required
26 extra auditing or the best auditors, and the tens of thousands who
27 never took their next step, Hubbard's grandiose claims about
28 Scientology are patently false.

1 150. The techniques, particularly the OT levels, and the
2 drastic personality changes, are dangerous and harmful to the
3 Scientology majority who apply them over long periods of time. They
4 induce mental illness of many kinds, such as dissociative states,
5 hallucinations, paranoias, suicidal ideation, all of which are
6 considered normal within CSI ... and death. I have seen many
7 Scientologists suffer, and live in pain, because of Hubbard's
8 beliefs, but now their own, that auditing would 'handle' their
9 physical or emotional or mental condition.

10 151. In forty four years, Scientology has produced only 50,000
11 Clears and 1,200 OT 8s, attached hereto as Exhibit 73. Yet CSI
12 claims an active international membership of six to thirteen
13 million. What happened to the rest?

14 152. CSI auditors are unlicensed practitioners who have no
15 professional or academic credentials about the human mind.

16 153. The wanton waste of human life in CSI is horrifying.

17 MY MENTAL ILLNESS INDUCED BY OT AUDITING.

18 154. I had a devastating experience in CSI. I did well at
19 first. But had great difficulty accepting the "BT" story on OT 3
20 and applying the techniques. I began "hearing voices" soon
21 afterward, at first faintly and then increasingly.

22 155. From 1974 onward, I suffered from intense, continuous
23 migraines - ironically brought on in auditing which was designed to
24 remedy forever the occurrence of headaches. I ended up in pain
25 twenty four hours a day, seven days a week, four weeks a month and
26 twelve months a year thereafter.

27 156. Periodically the "voices" got worse. I felt split into
28 hundreds of "me's", each arguing with the other. I got physically

1 and emotionally very debilitated. Because of Hubbard's doctrine, I
2 felt I must have done something terrible in a past life to be in so
3 much pain in the present. At times I thought I was going crazy.

4 157. But according to Hubbard's doctrine of the "overt
5 motivator sequence," I, and I alone, was responsible for my pain.

6 I was responsible for everything that happened to me. A burning
7 question was ... if the doctrine was correct and applied to every
8 Scientologist, how come the same doctrine didn't apply to to Hubbard
9 and Scientology? Because Hubbard and Scientology were experiencing
10 increasing quantities of problems internationally, year by year?

11 158. In my auditing sessions over the next seven years, I
12 almost went crazy trying to find the cause of the pain - to no
13 avail. Until early 1976, I received thousands of hours of daily
14 auditing, with Hubbard as my case supervisor - to no effect.

15 159. I was often unable to work for two to three days each week
16 due to the pain. I could not lie down because the pressure of the
17 pillow or mattress on my head made the pain unbearable. It was all
18 known to my auditors, case supervisors and Hubbard.

19 160. I finally realized that my only solution to stopping the
20 pain was to end my life. I mentioned this in my auditing sessions
21 repeatedly. In late 1977 in Clearwater, Florida, I was sent to a
22 doctor for physical tests - with no result. This depressed me more.
23 I searched for help in Hubbard's writings; I asked a few Class 12
24 auditors for any Hubbard bulletins, books or tape references that
25 would help me. Paulette Cohen referred me to Hubbard's Expanded
26 Dianetic taped lectures. I listened to all of them. The material
27 referred to evil purposes, evil intentions and other things. But it
28 didn't address my problems. I ended up more confused. I continued

1 getting regular sessions though Hubbard no longer did the case
2 supervision. Sometimes my sessions went badly for weeks. A big
3 square piece of red paper, a "red tag," was frequently pinned to the
4 front cover of my pc folder. It denotes a failed session in which
5 the preclear did not improve. Every time I saw the "red tag." I
6 felt more guilty that I wasn't respond to Hubbard's techniques.
7 This redoubled my efforts to find what was wrong. I was reduced to
8 terrible, continual fear for my life and sanity.

9 161. I was also fearful that by REMAINING at the CSI HQ in
10 Clearwater, my presence would harm Hubbard, his family and his
11 goals. The only solution I could see was to leave, or die. I came
12 very close to committing suicide several times. What held me back
13 was the hope, always the hope, that the next session would bring
14 relief. Sometimes I took up to 15 aspirin a day to alleviate the
15 pain - it never did. I always told my auditors what I was thinking
16 about, including how many times I nearly jumped from the top floor
17 of the Clearwater building but refrained because it cause disrepute
18 to Hubbard and CSI, how many times I almost broke into the Medical
19 Officer's room to find relief for the pain, how I planned to run
20 away and burn my ID (to prevent ill reputa to Hubbard and
21 Scientology) and kill myself.

22 The only things that prevented me from leaving Scientology earlier
23 or killing myself, were my dedication to Hubbard and complete belief
24 in him and my adamant unwillingness to bring ill reputa to his name
25 and his organization. This continued until I left the Clearwater
26 HQ in March 1982 of my own accord.

27 162. I was never given licensed medical or mental health
28 assistance, only that provided by Hubbard's Scientology techniques

1 which was inadequate for the task.

2 MY EXPERIENCE AUDITING OTHER SCIENTOLOGISTS WHO EXPERIENCED
3 PSYCHOTIC EPISODES, PTS TYPE III EPISODES, DEVELOPED SUICIDAL
4 IDEATION AND/OR COMMITTED SUICIDE.

5 163. During my twenty years in Scientology, I delivered
6 thousands of hours of auditing to others, among them preclears with
7 similar experience to mine and worse, and some who committed
8 suicide.

9 164. In mid-1985 a high level Scientologist, Mary Florence
10 Barnett, called Flo, phoned me. She was Miscavige's mother-in-law.
11 I had left CSI the previous year. Flo cried on and off during the
12 call. She complained of severe, constant pain in her head which
13 nothing helped. According to her doctor, a recent head operation to
14 repair an aneurism wasn't the cause, but he did not know what the
15 cause was. Flo was very scared of the pain, and kept saying she
16 wanted to kill herself to stop the suppressive BTs from taking over
17 her mind. Both the Advanced Organization in Los Angeles ("AOLA")
18 and the Clearwater HQ refused to audit her because she had no money
19 to pay. Flo had been to the Advanced Ability Center ("AAC") once,
20 a break-away former CSI group in Santa Barbara, and had good
21 auditing there, but had no money to return.

22 165. Flo was very depressed after her daughter Shelley,
23 Miscavige's wife, came to visit and ended up screaming at Flo. Flo
24 said, in several of our phone talks, that neither Shelley or
25 Miscavige cared a damn about her, and she was horrified into what
26 monsters Scientology had turned her children. However, she
27 promised to call Shelley again and ask for help.

28 166. I was deeply concerned about Flo's condition, but felt

1 incapable of helping her as I doubted the effectiveness of auditing.
2 I spoke with Camille, another daughter living with Flo, who said her
3 mother refused to see the doctor because he hadn't helped her and
4 said her condition wasn't serious. Camille said her sister Shelley
5 and brother-in-law Miscavige knew about their mother's condition but
6 refused to see her or have anything to do with her because, they
7 said, Flo was making herself ill, refusing to see the doctor, and
8 was "down stat"³¹.

9 167. Over the next few weeks Flo called me and I called her
10 many times. We spoke frequently, sometimes for hours. On occasion
11 Flo begged me to get rid of the suppressive BTs that were killing
12 her; at others she refused auditing because, as she said, "That's
13 what messed me up in the first place." I spent a lot of time
14 listening to her and letting her talk - she had a lot of fears and
15 hurts. She cried a lot on the phone. She was in constant pain,
16 unable to eat or sleep, and wanted to die or kill herself. She was
17 very scared of the "things" she was seeing and hearing. She often
18 talked about the suppressive BTs, that they were torturing her and
19 making her go crazy, that they were implanting bad things into her
20 and that she had to make them stop or go away. She said she'd heard
21 and seen the "things" for years, but "they" were strengthening their
22 hold on her. Several times, Flo openly blamed CSI for her condition
23 and spoke bitterly about how CSI messed her up in auditing, that
24 Scientologists were callous and, now that she was out of money
25 having given it all to CSI, no one cared about her enough to help,

26 ³¹Downstat - 'down statistic' or 'down statistics.' A Hubbard
27 phrase for one or more production statistics showing a down trend
28 on a graph. This means that production in a given area or by a
given person is decreasing steadily over time, or is going down.

1 not even Shelley and Miscavige.

2 168. Camille verified that Flo had no money left and that was
3 why CSI would not help her.

4 169. Two days after our last talk, Camille called and said Flo
5 had shot herself. I was devastated.

6 170. Two days later, Camille called again. We talked about
7 Flo. She said whereas she was grieving over Flo's death but
8 relieved her pain was over, Shelley's response was cold and
9 indifferent, and relieved the embarrassment was finally over.
10 Camille asked Jerry and me to attend Flo's funeral which would be
11 small and limited to family and close friends.

12 171. But the next day, Camille called again and asked us not to
13 attend. She hoped we weren't hurt by her request, but Miscavige,
14 Shelley and other CSI top executives had decided to be there after
15 all because they felt it was a duty and "to put on a show."
16 Therefore our presence, as former Scientologists, wasn't wanted and
17 would cause tension. I was very cross and upset, because Flo's
18 Scientology relatives had done absolutely nothing to help her, but
19 were going to put on a show for her funeral. But I agreed, and we
20 sent a large wreath and a card instead -- for Flo's sake. Later,
21 Camille thanked us for understanding. That was the last I heard from
22 Camille.

23 172. In his February 17, 1991 declaration, Miscavige wrote on
24 page 1, attached herein, "My only association with this tragedy was
25 to console my wife who was understandably emotionally traumatized
26 and grief stricken." Camille gave me the completely contrary
27 impression - that Miscavige's wife, Shelley, was uninterested in
28 anything to do with Flo and greatly relieved that her embarrassing

1 mother was finally out of the picture.

2 173. It is improbable that Flo, in her debilitated physical and
3 psychological condition, shot herself three times in her chest and
4 once through her head with a rifle, leaving no powder burns or
5 marks, according to the Forensic, case, investigator and coroner
6 reports, attached hereto as Exhibit 74. Yet, by all reports, this
7 is what she did.

8 174. Facts that lead me to strongly doubt Flo died like that
9 are the following: (1) she received three rifle shots through her
10 chest and one rifle shot through her temple; (2) there were no
11 powder burns or marks at the gun shot sites; (3) her debilitated
12 physical and psychological condition didn't permit her to hold the
13 rifle far enough away to shoot herself four shots without leaving
14 marks.

15 175. According to both Flo and Camille, Flo was an
16 embarrassment to Miscavige and Shelley, as; (1) Shelley visited Flo
17 only once during her lengthy illness, Miscavige never did; (2)
18 Shelley ended her visit to Flo by screaming at her; (3) they never
19 took any action to assist Flo; (4) they considered Flo PTS due to
20 her connection to former high ranking CSI officials, David and Julie
21 Mayo, whom CSI declared Suppressive Persons, and her antagonism
22 toward CSI; (5) they considered Flo a "squirrel"³² for receiving
23 auditing from David and Julie Mayo.

24 176. However, Miscavige was also PTS because he was, " ...
25 connected to a person ... opposed to Scientology ..." and was, " ...
26 intimately connected with persons (such as marital or familial ties)
27

28 ³²Squirrel - Hubbard's term for Scientologists who alter CSI
techniques and do off-beat practices not allowed by CSI.

1 of known antagonism to mental or spiritual treatment or
2 Scientology." This per Hubbard's policy of 31 December 1978,
3 "EDUCATING THE PTS," attached hereto as Exhibit 75, pages 425 & 426.

4
5 177. Therefore Miscavige could not remain Chairman of the
6 Board, ASI, or hold any top command position according to Hubbard's
7 12 May 1972 policy, "PTS PERSONNEL AND FINANCE" attached hereto as
8 Exhibit 76, because "IT IS UNSHAKABLE POLICY HEREAFTER THAT NO
9 PERSON WHO IS PTS OR CHRONICALLY ILL ... MAY BE ON FINANCE ... LINES
10 OR IN TOP COMMAND POSTS ..." (emphasis in the original). The only
11 actions Miscavige could take were to get Flo back into CSI or
12 disconnect from her completely.

13 178. I have seen two letters from Flo Barnett dated 28
14 September 1984, one addressed to David Mayo, attached hereto as,
15 another to Julie Mayo, attached hereto as, who owned the Santa
16 Barbara AAC, and a third note dated 7 May 1985 to Julie Mayo, all
17 attached hereto as Exhibit 77. Knowing Flo's handwriting, I can
18 verify that these three notes were written by Flo Barnett.

19 179. Quentin Hubbard, the oldest son of Hubbard and his third
20 wife, Mary Sue, also committed suicide.

21 180. Hubbard wanted Quentin, a Class XII auditor and one of the
22 highest trained, to take over his technical position when Hubbard
23 died. Quentin didn't want to. His only wish was to become a pilot
24 and fly. During the 1970s while we were aboard, I often saw him
25 walking along the decks or passageways mimicking an airplane, with
26 one or both arms outstretched, weaving from side to side as he
27 walked and making engine sounds in his throat. He was never self
28 conscious, but just smiled or laughed as he passed by and carried

1 right on 'being' a plane.

2 181. Quentin went AWOL from the ship twice in 1975 while we
3 were on board the "Apollo" in the Caribbean. Both times, teams of
4 crew were sent ashore to look for him.

5 182. At one of those times, I was standing on B Deck Aft with
6 Hubbard, his wife Mary Sue, some Aides and the Ship's Captain, about
7 fifteen of us, waiting for Quentin's return. It was night time, and
8 cold. Hubbard was mad at Quentin. He muttered under his breath on
9 and off how much trouble Quentin was causing and the time he was
10 wasting. Several times Hubbard ordered specific penalties to be
11 assigned to Quentin after his return. Mary Sue was distraught and
12 worried sick about her son. When Quentin finally returned, he was
13 quiet and looked exhausted. Late that night, I heard Hubbard
14 shouting in his B Deck cabin.

15 183. In 1976, after we moved to the Scientology HQ in
16 Clearwater, Florida, I rarely saw Quentin as I was a senior
17 executive and he was an auditor.

18 184. In late October or early November, 1976 in Clearwater, a
19 GO staff member briefed us that on 28 October that year, Quentin was
20 found unconscious in his car outside Las Vegas and was hospitalized.
21 About two weeks later we learned he was dead. A few days after
22 that, we heard that Mary Sue ordered three autopsies done, and the
23 third located the cause of Quentin's death; he was suffering from a
24 rare disease. We weren't told its name. I and others I knew,
25 questioned why we were not given more information about how Quentin
26 was found, hospitalized and how he died.

27 185. Many years later, I saw the Coroner's report and the
28 Report of Investigation, both attached hereto as Exhibit 78, and I

1 read that Quentin had a possible cerebral abscess when he died, but
2 no trace of carbon monoxide toxicity. Attached as Exhibit 79, are
3 the November 23, 1976, St. Petersburg Times and Tampa Tribune, and
4 the November 25, 1976 St. Petersburg times news releases of
5 Quentin's death.

6 186. Another crew member who committed suicide was Susan
7 Meister. I was on board the "Apollo" in mid-1971 when she allegedly
8 shot herself. The ship was in Moroccan waters. Hubbard was aboard.

9 187. Susan was on board about six months. She was "PTS" - her
10 family was upset because the ship's location was confidential and
11 they did not know where she was.

12 188. In mid 1971, in my office on A Deck, I heard a strange,
13 sharp sound. It was traced to the aft bridge cabins where the
14 senior Ship's Officers berthed, and specifically to that of Chief
15 Officer Amos Jessup. Susan was found, shot, lying on the bunk in
16 Amos' cabin. I helped Mary Sue Hubbard, who was in charge of the
17 GO, to investigate the death. Mary Sue checked the aft bridge cabin
18 where Susan died. I checked Susan's bunk below decks and her
19 possessions, but found nothing amiss. Mary Sue had already removed
20 Susan's letters, note books and other personal effects. I arranged
21 for someone to send Susan's clothes to her family. We interviewed
22 Amos Jessup, who was visibly upset and shaking on and off. He
23 blamed himself, as Susan wanted a committed relation-ship and he
24 didn't. Susan was in the cabin alone after he went to work. He
25 didn't see her alive again. He had no idea she was suicidal.

26 189. We interviewed a deck hand who was working on A deck port
27 side, aft of the bridge cabin, when the shot occurred. He reported
28 the sound and located Amos. We interviewed Susan's superior, the

1 ship's medical officer and several other people. They all said
2 Susan was emotionally unstable. Mary Sue wrote a report for the
3 Moroccan police.

4 190. Scott Leland, a good friend of mine, also committed
5 suicide. I met Scott in 1965 in England. We went through several
6 courses together including the Class Seven Auditor Training Course
7 and the Clearing Course.

8 191. Afterward, Scott moved to Denmark, married and raised a
9 family. He went through all the OT levels up to OT 6.

10 192. I did not meet him again until 1986, when out of the blue,
11 he stopped to see my husband and me enroute to the Santa Barbara AAC
12 for auditing. He did not look well. He cried several times over
13 the next few days, telling me he'd been crazy for fifteen years and
14 that the trouble started after he went Clear. When he started
15 auditing on OT 3, he began hearing and seeing things and this
16 gradually worsened to where he thought he was going nuts. He
17 pleaded for help, saying he had no money for auditing at the AAC.
18 I was very concerned and scared over Scott's condition.

19 193. The AAC said Scott could return at no charge, or if he
20 wished, he could go to someone else and the AAC would provide case
21 supervised instructions free of charge. Scott never acted on the
22 offers.

23 194. Scott stayed with my husband and me for two weeks -- we
24 fed and housed him. Scott mainly slept, ate, took long walks and
25 read books. He looked and sounded much better when he left. He
26 went to the US East Coast to see his mother before returning to his
27 family, his wife and two young sons, in Denmark. I didn't hear
28 from him again.

1 195. In 1987 I heard Scott hanged himself in his mother's house
2 on the East Coast.

3 196. Another suicide occurred during the late 1970s while I was
4 in Clearwater. A well known Scientologist at the Clearwater HQ was
5 auditing her BTs and clusters. She drowned herself in the ocean off
6 Clearwater Beach one night. Her death was declared a suicide.
7 Reportedly no one knew she was suicidal. I don't remember her name.
8 Her suicide was very hushed up by Scientology top command in
9 Clearwater.

10 197. Other suicides which I know of are the following:

11 (a) Larrayne Johnston: She committed suicide in the mid to
12 late 1980s by throwing herself off a bridge into freeway traffic in
13 Los Angeles. She did this because Scientology would not help her
14 after it alienated her from her husband and family.

15 (b) Rodney G. Rimando: He was a Scientologist from San Jose,
16 California. He joined the Sea Org in Los Angeles in January 1986.
17 He committed suicide by "falling" out of a window. Police were given
18 a note by Church of Scientology officials which proved to be forged.
19 FURTHER SCIENTOLOGY VICTIM OF CANCER, as well as KIDNAPPING.

20 198. Roxanne Friend, a Scientologist, contracted cancer in the
21 late 1980s. She was getting auditing for her condition at the
22 Clearwater HQ, but was not doing well and repeatedly requested
23 approval to see a doctor. Her requests were not granted. She was
24 told continue on with her auditing. Finally, Roxanne left without
25 approval and went back home to San Diego for medical treatment for
26 her condition. In the early 1990s, her brother, according to his
27 deposition in which he reports the following, and also a
28 Scientologist got an RV, and with some of his friends, captured

1 Roxanne, drugged her and drove her back to Florida, with Roxanne
2 druggily protesting on and off all the way. The Scientologists/Sea
3 Org members in Clearwater held Roxanne captive in their Clearwater
4 complex for several months, against her will. She was finally able
5 to get away and back to San Diego. Roxanne's illness has advanced
6 since then. She still lives in San Diego and still wants to take
7 action against CSI, and, if her current strength continues, feels
8 she may be able to do something in that direction.

9 **SCIENTOLOGISTS WHO ATTEMPTED SUICIDES.**

10 199. Some attempted suicides that I know of:

11 (a) Jim Hester was a preclear at the Miami Org in the mid to
12 late 1970s. He attempted suicide in Miami and was then hospitalized
13 in critical condition. He left a suicide note blaming Scientology,
14 attached hereto in Exhibit 80, a copy of a GO report.

15 (b) Leah Theriery. She attempted suicide sometime in May
16 1974, attached hereto in Exhibit 81, a copy of a GO report.

17 (c) A friend of Gerald Simon's who was a Scientologist,
18 attempted suicide by drinking a full can of RAID insect killer
19 because he had been ordered to disconnect from his girlfriend.

20 200. I saw many Scientologists and Sea Org members go crazy
21 and/or suicidal, like myself, while getting auditing.

22 201. During the early 1970s on board the "Apollo," I was
23 Commodore's Staff Aide One, a position with international
24 responsibility. Hubbard was my direct superior. A visiting
25 Scientologist, auditing on the OT 3 level, went crazy, shouting,
26 screaming, moaning incessantly and throwing himself around. I saw
27 Hubbard give orders as to his care; he was to be confined in an aft
28 cabin where his screams would not disturb top or middle management

1 working in the fore and mid sections of the Apollo; three strong men
2 were to guard him twenty-four hours a day, in eight hour shifts,
3 until he was sane; he was to get three meals daily whether he ate
4 them or not; his captors were to maintain complete silence around
5 him at all times whether he spoke or not; Hubbard was the only
6 person who could communicate with the man and he did so by writing
7 notes; the captors were to have sufficient "cal-mag" (a Calcium
8 magnesium drink of Hubbard's own recipe and reportedly conducive to
9 relaxation and sleep) on hand for the man to drink if he wanted it.

10 202. Hubbard personally supervised the man's "case handling"
11 during his imprisonment. He wrote the man daily. Responses, when
12 they started, were brought directly to Hubbard. The man was given
13 some medication, prescribed by Hubbard, but I don't know what. The
14 man almost got away from the guard once and was forced back into the
15 cabin and tied to his bunk. He was held captive for over two weeks.
16 He gradually calmed down, was released into the shipboard community,
17 got some auditing and finally returned to the USA.

18 203. At no time was he seen or treated by a qualified medical
19 doctor. Hubbard's directives on handling the man were later used as
20 a guide for similar cases.

21 204. During the early 1970s, Bruce Welsch, a crew member on
22 board the "Apollo" went crazy, or Type 3 PTS. He was locked up in
23 a port aft cabin by Stuart Moreau and Ron Anderson, two ship crew
24 members. I was in the aft area a few days later on some work
25 assignment and I could hear Bruce making almost animal type sounds.
26 They were terrible, inhuman sounds. And I could hear what I thought
27 could be chains rattling. I was not around when Bruce recovered.
28 Attached hereto as Exhibit 82, page 2.

1 205. In 1980 I was auditing at the Clearwater Organization HQ
2 in Florida. A young woman, who was receiving Life Repair auditing
3 from another auditor, began hearing "voices" talking to her.

4 206. She was reassigned to continue her auditing with me. The
5 voices really scared her; she couldn't think of anything but the
6 terrible things they said to her and told her to do.

7 207. From then on, the hundreds of hours of auditing I gave her
8 were directed, by the Case Supervisor and the Senior Case
9 Supervisor, at resolving the "voices." To no avail. She was
10 transferred to yet another auditor, and then finally went home. I
11 never knew what happened to her.

12 208. In 1966, I audited a nine year old girl at Saint Hill
13 Manor, England, simple locational processes. During the session,
14 she became violent, screaming and shrieking abusively as she kicked
15 and bit my hands and arms. She flung herself against the furniture
16 and onto the floor, spat at me and gagged a few times with her eyes
17 rolling. I tried to hold her, gently yet firmly, so she didn't hurt
18 herself, but she kicked and bit me and screamed all the more. I was
19 scared. I continued the session as long as I could, because
20 Hubbard's doctrine ordered, "What turns it on will turn it off." As
21 soon as the girl was quieter, I ended the session and got John
22 McMaster, the Qualifications Secretary,³³ to advise how to continue.

23 209. 194. The family returned to Scotland though - young girl
24 got no further auditing. John told me that her parents were happy
25 with her auditing results. I never knew how she was thereafter.

26 210. In 1969 or 1970, while I was Deputy Commodore for the
27

28 ³³Qualifications Secretary - the head of the Quality Control
Division of a CSI organization.

1 United States and stationed in Los Angeles, a young man in his mid
2 to late twenties, was auditing on OT 3 at AOLLA. He went "crazy" in
3 session one day. He was incoherent, screaming and hallucinating,
4 seeing "things" on the wall and on himself. At times he was violent
5 and kicked the walls and threw himself around.

6 211. The AOLLA staff locked him up in a 2nd floor auditing room
7 at the back of their building. Sheets, mattress and a pillow were
8 put in the room. Everything else was removed so that he could not
9 harm himself.

10 212. He never received medical help. We did not know or trust
11 any medical doctors enough to let one in on the flap. The man was
12 fed and held captive in the room under twenty four hour guard. I
13 don't remember how his bathroom trips were arranged.

14 213. I saw him three weeks after he was "sane. He apologized
15 over and over for the trouble.

16 214. I reassured him as best I could. I was incredibly
17 relieved he was alright. He left shortly thereafter and returned to
18 his home elsewhere in California. I never saw him or heard of him
19 again.

20 215. I also had contact with many former Scientologists who
21 were suicidal. Larry lived with his wife in Washington State.
22 They were long term Scientologists. In 1986 or 1987, he arrived
23 unannounced at our home in Los Angeles. In rambling, disconnected
24 sentences, he told my husband and me that he left Seattle in order
25 to kill himself, he had thought about it for a long time, his wife
26 did not know where he was and he did not want her to know. He said
27 his business and marriage failed, his Scientology gains had
28 disappeared, the more auditing he received, the worse he got, and it

1 was all his fault. He was confused and scared. He said that when
2 he reached Los Angeles he remembered where we lived and came for
3 help. My husband and I were both shocked at his condition and very
4 concerned for his safety. Larry stayed with us for several weeks in
5 our home. We fed and clothed him.

6 216. He spent the first two weeks sleeping and eating. He read
7 and watched TV a lot. We talked often. He got better. We
8 encouraged him to see a licensed counsellor or therapist for help,
9 but he refused.

10 217. After three weeks, I got Larry to call his wife to let her
11 know where he was, that he was safe and would be home soon. They
12 spoke a long time. From then on, they talked regularly by phone.
13 He and his wife now live in another state and are happy and doing
14 well.

15 218. Larry was fortunate. I wish there were more who recovered
16 like he did.

17 219. David Voorhees lives in Washington State. In 1982 or
18 1983, he had a similar experience in Los Angeles. He was auditing
19 on the OT levels and experiencing great difficulty. He could not
20 apply the materials to himself yet knew that he had to. He went
21 crazy trying to audit the BTs and clusters. He was held captive in
22 a room somewhere in Los Angeles for weeks and injected with
23 Thorazine injections by his captors to calm him. In his more lucid
24 moments, David was told by his captors that he was getting Vitamin
25 B injections. Attached hereto as Exhibit 83.

26 Another suicidal person was former Sea Org member, Ethel Budd
27
28

1 Miller. Sometime in the mid to late 1970s, she wrote an SO1
2 letter³⁴ which could have been a veiled suicide threat, attached
3 hereto as **Exhibit 84**, a copy of a GO report.

4 220. Even today, Scientologists are still going crazy while
5 applying Hubbard's auditing techniques. A recent expose from an
6 English newspaper reveals shocking instances of Scientologists going
7 crazy and being imprisoned at or near the Saint Hill Manor CSI
8 headquarters in East Sussex, attached hereto as **Exhibit 85**.

9 **DEATHS OF SCIENTOLOGISTS.**

10 221. Lori Wood, the daughter of long term Scientologists, Peter
11 and Doran Greene, was also a Scientologist and Sea Org member. She
12 served with me aboard the "Avon River" in the Mediterranean when I
13 captained the ship. Lori was at the Scientology/Sea Org Clearwater
14 HQ in 1978 or 1979, while I was there. She was receiving auditing
15 on OT 5 (which exorcised more BTs and clusters), or "NOTS" as it was
16 then called. She got quite ill at one point during her auditing
17 and was sent to the Ethics Officer. For some reason that I do not
18 know, the ethics matter, if it fact there was anything incorrect she
19 was involved in regarding ethics matters, escalated and kept on
20 escalating. I asked at one point what was going on but could not
21 get an answer. A short while later, without recovering from the
22 illness, Lori died. What upset me so terribly about her death was
23 that: (a) she was a good Scientologist; (b) she was in the middle
24 of an auditing program; (c) she was being harassed by the Ethics
25 Officer, Rae Matheson ("Matheson"), while she was ill, which is

26 ³⁴SO1 letter - "Standing Order Number 1." This was a standing
27 order of Hubbard's. It said, "All mail received by me shall be
28 read by me." Reportedly, Hubbard read and personally replied to
all mail sent to him - in fact, he had an "SO1" unit which did all
the work for him.

1 unpardonable, and while she was getting physically worse. Her
2 mother told me that when she, Doran Greene, challenged Matheson as
3 to why he ordered the attack on Lori when she was in the middle of
4 an auditing program as well as being ill, Matheson shrugged and
5 huffed and said, "Where is that in writing?" Matheson's statement,
6 though referring to a basic law of Hubbard's, "If it isn't in
7 writing, it isn't true," never-the-less showed a characteristic
8 Scientology attitude toward anyone who was in trouble or ill, who
9 was making mistakes, or not making the expected progress in his
10 auditing or training - it was the person's fault, it was always the
11 person's fault, never that of Hubbard, his policy, his techniques or
12 his organization ... never. The policy referred to is titled,
13 "ORDER BOARD AND TIME MACHINE³⁵," attached hereto as Exhibit 86,
14 which states, "In Scientology if it is not written it is not true.
15 That's a major policy. It applies to all. Every order an Executive
16 issues must be in writing."

17 MANY SCIENTOLOGISTS WHO DIE FROM CANCER ARE GETTING ONTO AND
18 AUDITING ON THE OT LEVELS.

19 222. I have known many Scientologists and Sea Org members who
20 died from cancer. The common denominator among them is that they
21 did not seek medical assistance rapidly, when they first noticed
22 something wrong. The overwhelming belief among Scientologists and
23 Sea Org members was to get audited or continue on with auditing (if
24 they were already receiving auditing) with the conviction that
25

26 ³⁵Time Machine - a series of folders, one for each day of the
27 week or month. Orders sent to one's subordinates can be placed in
28 the folders according to the day on which the orders are to be
complete. When the "completion" day arrives, the orders placed into
that folder can be checked for compliance. The Scientology the time
machine consists of a series of seven baskets only.

1 auditing would resolve the cancer.

2 223. In Hubbard's 1975 edition of his book, History of Man,
3 Hubbard wrote on page 20, "Cancer has been eradicated by auditing
4 out conception and mitosis." Attached hereto as **Exhibit 87**. This,
5 and similar claims for other illness in Hubbard's DMSMH, may have
6 helped to bring about the disregard for the medical doctor. In the
7 recent edition of the same Hubbard book, History of Man, which,
8 ironically occurred after Hubbard's death, a rewrite of the
9 statement above occurs, saying, "Cancer has reportedly (emphasis
10 added) been eradicated by auditing out conception and mitosis."
11 There is no accompanying statement in the recent edition of the book
12 saying that Hubbard authorized the change prior to his death, which
13 he would have had to do for the change to be valid.

14 224. A friend of mine, Yvonne Jentzsch, died of a brain tumor.
15 In early August 1967 I joined Hubbard's Sea Project in Las Palmas,
16 Canary Islands. Yvonne was already on the ship and we got to know
17 each other well.

18 225. In 1969 and 1970, while I was stationed in Los Angeles as
19 Deputy Commodore U.S., Yvonne was the Commanding Officer of the
20 first Los Angeles Celebrity Center. We met frequently in a work
21 capacity as well as socially.

22 226. During the early to mid-1970s, I flew to Los Angeles on
23 assignment several times and met Yvonne.

24 227. During 1977 we exchanged letters. Her's were shorter than
25 usual, just brief notes. I noticed the change as Yvonne was known
26 for her lengthy letters. She said she was tired, losing weight and
27 getting headaches, all unusual for her. I didn't think much about
28 the last; I also had constant headaches.

1 228. In late 1977, Yvonne suddenly arrived in Clearwater, very
2 ill. She talked with difficulty, lost track of what she said half
3 way through a sentence and lost her balance while walking. Yvonne
4 told me she had a brain tumor and that she was dying. She said she
5 hadn't seen a doctor because she thought auditing would fix it. The
6 illness started with an "out of balance" feeling which she assigned
7 to lack of sleep. The doctor told Yvonne the tumor was removable if
8 she had seen him earlier. We both cried. I knew auditing did not
9 resolve everything, but I was shocked that her life was wasted
10 through such neglect.

11 229. She said that Hubbard ordered her to Florida for auditing
12 to ease the transition, meaning death, as well as to do an end of
13 cycle³⁶ on her "hats"³⁷ so that someone else could take over her
14 Celebrity Centers after she "dropped her body"³⁸. One day she cried
15 and blamed herself for the terrible overt³⁹ of dying and deserting
16 Hubbard. She was in continual pain but wouldn't take pain killers so
17 that she could get auditing. On a later occasion, Yvonne was quite
18 philosophical about her forthcoming death and said she was phasing
19 out of her life and no one should grieve. I knew at that point that
20 Yvonne had had auditing on her nearing death and that, in
21 Scientologese, she had discharged any fear or trauma connected to
22 it. Now I see that what occurred, as with all other auditing, was
23

24 ³⁶End of cycle - a finite stop. (The definition comes from
Hubbard taped lecture #5311CM24)

25
26 ³⁷Hats - Hubbard's term for the positions one holds and for job
descriptions.

27 ³⁸Dropped the body - Hubbard's term for death.

28 ³⁹Overt - Hubbard's term for transgression or sin.

1 that Yvonne's reactions to death were temporarily desensitized,
2 according to what I have learned from mental health authorities.

3 230. Over the next few weeks Yvonne's condition deteriorated
4 rapidly. One day when we were outside, she spoke with increasing
5 difficulty and went unconscious several times for short periods. It
6 took us a long time to get up the stairs from the garden to the
7 building Lobby, even with my help, because she could not coordinate
8 her leg movements. She never received medical treatment of any kind
9 that I know of.

10 231. Yvonne died in early 1978. No one I know of, except her
11 family, was informed about her death for days or about funeral
12 service. Nor were her close friends, such as I, given an
13 opportunity to do a proper closure with Yvonne. We had a short
14 briefing in which we were told that Yvonne had dropped her body
15 happily and was in good case shape to pick up the next one, and that
16 as this was a happy occasion, there was to be no time wasted in
17 unnecessary grieving. Those most affected were only given auditing
18 sessions.

19 232. Hubbard, in a published memo after her death, applauded
20 Yvonne's achievements and granted her a leave of absence for twenty
21 one years until she rejoined the Sea Organization in her next
22 reincarnation.

23 233. Another Sea Org member who died of cancer was Carol. She
24 developed breast cancer after joining the Sea Org. She told me that
25 she did not report it because she believed that auditing would cure
26 it. She also did not want to bother anyone.

27 234. Carol never received medical treatment for the cancer.
28 She never got regular PAP smears and mammograms.

1 235. In the late 1970s, after the cancer became terminal, Carol
2 was hospitalized. Because I had an RN⁴⁰ degree, Cathy Heard, a GO
3 staff member, assigned me to take Carol home to her parents in
4 England to die there. Cathy said she could not die in Clearwater as
5 it would be bad PR for Scientology and the Sea Org. 222. Carol
6 looked terrible when I saw her. She had lost fifty pounds, was very
7 weak and her mind was wandering. She pleaded to stay in Clearwater
8 because she did not want to go back to her family. I told Cathy but
9 the request was ignored.

10 236. The hospital nurses said Carol could not travel in her
11 condition, particularly as she did not want to. Her xrays showed
12 the cancer spread throughout her body into all major organs. Cathy
13 instructed me to give the nurses a "shore story"⁴¹ saying Carol's
14 parents wanted her to visit them for years, that Carol had disobeyed
15 them for years, that they were now demanding her return, and we had
16 found out and were desperately trying to intercede before it was too
17 late. After hearing the story, the nurses became very helpful.

18 237. Her parents were very happy to see Carol though shocked at
19 her condition. The family doctor was so disgusted after I gave him
20 the medical reports the next day, and that Carol travelled while
21 critically ill, that he refused to talk to me thereafter. The
22 parents were very grateful that I had helped Carol get home. I
23 stayed in England with the family for a week. Carol slept most of
24 the time - she was too weak to get out of bed.

25
26 ⁴⁰RN - registered nurse.

27 ⁴¹Shore story - a fabricated story, not necessarily truthful,
28 designed to placate another. Hubbard included the tactic in his
public relations policies as well as his policies on 'covert'
handling of his enemies.

1 238. I then flew back to Clearwater and debriefed. I was
2 deeply disturbed by the experience. Ironically, I was assigned a
3 condition of "power" by Cathy and Liz for successfully handling a
4 potentially dangerous and sensitive situation. Carol's death was not
5 known about in Clearwater. For years afterward, I wondered if there
6 was more to Carol's death than I knew. Because death is natural.
7 It shouldn't be a "dangerous" or "sensitive" situation.

8 239. Sally Esterman (formerly Chaleff) was another Sea Org
9 member who died of cancer in January 1987. She developed cervical
10 cancer, which in 99% of cases is curable if caught early. Sally
11 never received regular PAP smears or mammograms, and by the time she
12 reported her condition, the cancer was terminal. She gradually
13 weakened until she was unable to work.

14 240. Sally was put into a convalescent home near the
15 Scientology Complex in Los Angeles. She was bed ridden, too weak to
16 do anything, for over a year. The room she was in and her sheets,
17 towels and night clothes, were filthy. She didn't have the strength
18 to clean them. Sally had no visitors, not even her Scientology
19 husband, Mitch, who worked nearby. He was mad at her, said she was
20 lazy, that she allowed herself to get ill so as to shirk work.

21 241. Sally was left to die on her own. She was in terrible pain
22 continually, with nothing to alleviate it. Dr. Gene Denk ("Denk"),
23 a Scientologist physician, saw her occasionally. It was Denk who
24 gave Hubbard's medical officers blank, signed prescription forms so
25 Hubbard could get all the drugs he wanted. Denk still treats
26 Scientologists and Sea Org members to this day. He told Sally one
27 day that she was too far gone, and all that was left for her to do
28 was die and that she better not mess that up. Fortunately, Sally

1 had a friend who was no longer in Scientology. "Anne" saw Sally,
2 after learning where she was, for the first time after she
3 contracted cancer, at which time Sally weighed only 60 lbs. "Anne"
4 looked after her from that point on for four months until Sally
5 died. "Anne" cleaned out Sally's room completely, got her
6 medication for the pain, clean clothes and sheets and other
7 necessities, including flowers for her room. Sally suffered her
8 last days on her own, abandoned by Scientology. Not even her former
9 husband, Ira Chaleff, was told she died. Her death was very hushed
10 up. She did have one friend though.

11 242. Some years earlier, Sally's former husband, Ira Chaleff,
12 who was a declared suppressive person, came to Los Angeles,
13 demanding to see his 17 yr old son, Sky. When he was ignored, Ira
14 demanded to see Heber Jentzsch, CSI President. Ira was told to see
15 the Ethics Officer because of his SP declare. Ira got mad, flashed
16 his Congressional I.D.card, and suddenly that he didn't have to see
17 the Ethics Officer and got to see his son instead. He found Sky was
18 way below grade average and suicidal. Even though Sky worked a
19 regular schedule at the Scientology organization, he was denied all
20 services because his father was an SP. Ira took the boy back to
21 Washington with him ... Sky just recently graduated Magna Cum Laude
22 in Computer Science, and is now a healthy young adult with his whole
23 life ahead of him.

24 243. Susan Todhunter, a long term Scientologist, died of cancer
25 recently in San Diego. She was an opera singer and a Scientology
26 'celebrity.' Her family wealth allowed her continual auditing. I
27 audited her in Clearwater between 1979 and 1981 when I was a "case
28

1 cracking"⁴² auditor. Later on she completed OT 7, the highest OT
2 level which exorcises BTs and clusters. She developed cancer in the
3 1980s. Because of her wealth, Susan got auditing from top trained
4 auditors at the Los Angeles Celebrity Center almost up to her death.

5 244. Marie Passmore was a long term Sea Org member, a Class 8
6 trained auditor, and on the OT levels exorcising her BTs and
7 clusters. She developed cancer in the late 1970s or early 1980s,
8 and then got auditing in Clearwater, as she told me, to cure her
9 cancer. She was convinced that exorcising her BTs on OT 5 would
10 cure her. When the cancer became terminal, she was sent to Europe
11 to die. I never saw her again. Her death was hushed up.

12 245. Phoebe Mauerer was also a long term Sea Org member. She
13 was a trained auditor, and was exorcising BTs and clusters on the OT
14 levels. In her last years, she was stationed in Los Angeles and
15 Scientology's secret HQ at Gilman Hot Springs in the Southern
16 California desert.

17 246. Phoebe did not believe in doctors and never got regular
18 PAP smears or mammograms. After she found she had cancer, she went
19 to Mexico for treatments. She eventually died.

20 247. Jens Bogvad was also a long term Sea Org member. He was
21 Executive Director Tokyo Scientology Org when he contracted cancer.
22 He had studied and graduated many of Hubbard's management courses,
23 including the Org Exec Course, the Flag Briefing Course, and others.
24 He was also a Class 8 auditor and on the OT levels, exorcising his
25 BTs and clusters. He was finally sent home to Europe to die. His
26 wife, Jeannie, is now the Exec Dir of the Los Angeles Org, and has
27

28 ⁴²Case cracking auditor - an auditor who is better trained and
experienced to resolve the 'difficult' preclears or cases.

1 remarried.

2 248. Betty Filisky was another long term Scientologist. She
3 was the first person to complete OT 5 after its release in 1978, and
4 received a lot of Scientology publicity on her achievement.

5 249. Betty was already suffering from cancer when she completed
6 OT 5, but she believed she was cured. She relapsed six months later
7 and died. Her death was so hushed up that not even her former
8 husband and one child, also Scientologists, knew. He found out by
9 chance about Betty's funeral service in Texas, and so was able to
10 attend.

11 250. Peggy Bankston was also a close friend of mine. She was
12 an original Sea Project/Sea Org member, a class 6 trained auditor
13 and a graduate of the upper level OT 3 auditing. Peggy was already
14 on board the "Avon River" in Las Palmas, in early August 1967, when
15 I arrived. Peggy held various positions on board, the main one
16 being that of Flag Banking Officer and Hubbard's personal Finance
17 Officer. She was very admired by Hubbard and he gave her a number
18 of assignments to do which she always did well. Sometime in late
19 1967, she suddenly fell into disfavor with Hubbard, then got ill.
20 Shortly thereafter, she left the ship, quietly and quickly. I was
21 away at the time and never found out what occurred exactly. When I
22 returned, I found Hubbard had written an ethics order about her,
23 which shocked me, attached hereto as **Exhibit 88**. Several years later
24 I found out Peggy had died of cancer. She was living somewhere on
25 the West U.S. coast at the time. I was never able to find out
26 whether she had cancer when she was in the Sea Org or not. She did
27 have a large, darkened skin blemish her left cheek, about an inch in
28 diameter, somewhat similar to a mole but much larger, which Hubbard

1 Hubbard verbally abused her about. For example, he said to her,
2 "You have that thing on your face because of overts, you know that,
3 don't you?" ... and ... "If you're an OT, why don't you get rid of
4 that overt on your face?" ... and ... "You haven't told all yet!"
5 Then he would laugh at her and walk away.

6 251. Daphne Parselle was in Scientology in the late 1960s, in
7 London and Saint Hill, East Grinstead. She achieved the state of
8 Clear in 1967. During her Clear speech, (Clears in those days gave
9 a short speech about their 'wins and gains' in reaching the state)
10 in the Chapel at Saint Hill Manor, she claimed, very positively and
11 enthusiastically, that she was cured of the cancer because of her
12 auditing. However, she died of the cancer shortly thereafter.

13 252. Ellen Carder was an American, and a Scientologist in the
14 early 1960s. She had cancer. She went to England for advanced
15 auditing. While there, she claimed that Hubbard told her that if
16 she studied the Clearing Course and then applied the auditing
17 techniques to herself to achieve the State of Clear, her cancer
18 would be cured. Ellen started on the course of action. However she
19 died in June 1966 at Victoria Hospital, East Grinstead, England -
20 from the cancer.

21 253. A high level German Scientologist who came to Clearwater
22 for upper level auditing on BTs and clusters, died one day in his
23 room. The "PR story" was he slipped in his bathtub one day and
24 died. I don't remember his name. His death was very hushed up by
25 Scientology top command in Clearwater.

26 SCIENTOLOGISTS AND SEA ORG MEMBERS ARE OFTEN LOCKED UP AND HELD
27 AGAINST THEIR WILL, SOMETIMES FOR MONTHS.

28 254. In May 1978, I was assigned to the Rehabilitation Project

Force ("RPF") in Clearwater, Florida, attached hereto as **Exhibit 89**. This is a Sea Org detention camp, a 'gulag,' to which are assigned Sea Org members who have (according to Hubbard's doctrine and policies) seriously erred or produced badly. My assignment was for being a failed executive and for not doing well on my job. In addition, a recent auditor of mine reportedly saw a specific E-meter needle reaction occur during my session. It was called an R/S.⁴³ The R/S reportedly occurred while I was talking about Hubbard, his techniques or organizations, and that meant, again according to Hubbard, that I harbored bad intentions toward Hubbard, his techniques or organizations, and therefore, I was a bad person and required immediate isolation and "rehabilitation." I was commandeered off between two big Sea Org men, both already in the gulag, to the second floor garage of the Fort Harrison Hotel and locked up in solitary confinement for two or three days, in a small room, without windows and a mattress on the floor. I was devastated, in shock and numb ... (Needless to say, 18 months later, I was exonerated of the charges, as per **Exhibit 90**.)

255. It was common to treat Sea Org members this way, from top command to galley hands. And it was common for those assigned to the RPF, or gulag, to be locked up in solitary for one to several days or more until the person had 'calmed' down, come to his senses and realized he needed rehabilitation. He was then released into the arms of other inmates to do his 'time' and attend to his and

⁴³R/S - Rock Slam. A needle read which occurs on Hubbard's Scientology E-meter or electrometer, which is basically a skin galvanometer and measures heat and moisture changes in the skin. The person being audited holds a tin can in each hand through which the changes are detected according to questions asked the preclear and his responses. It is a cruder instrument than a lie detector which has additional monitors of breath and pulse.

others rehabilitation.

256. Some months later, also in 1978, a new person was assigned to the RPF, Lyn Froyland. She was to be my twin - meaning we were to help rehabilitate each other. I found out to my surprise that Lyn was a GO staff member from Los Angeles and on assignment to Washington, DC, and was sent from there to Clearwater. Customarily, GO staff weren't ever RPF'd with Sea Org members. I also rapidly learned that Lyn was devastated over something which occurred in Washington, D.C. She said something terrible was going on, Hubbard and GO policy was being completely violated. She tried to correct the situation, only to find herself removed from the assignment and in the gulag with no recourse. To rehabilitate herself, Lyn was expected to talk about her upsets and problems in her gulag auditing. But she would not. She maintained that she had been bonded many times and could not and would not reveal security and confidential information about her organization, the GO, her position or her assignment. Because of the continued refusal to cooperate, Lyn was rapidly assigned to the RPF's RPF. This was several steps down from the RPF, in the boiler room under the Ft. Harrison hotel building. It was a dark, filthy, smelly place where the huge boilers roared and clanked day and night and where the rats lived. Lyn was chained to a pipe down there for weeks, under guard. She was taken meals and allowed toilet breaks, but no other hygiene. I tried desperately to get her to repent and get out of the hole, but she would not. The longer she stayed in the hole, the less she spoke and the more unwilling, sullen, filthy and feral looking she became. I was stunned by what was happening to Lyn. Finally, she did the actions necessary to get out of the hole and back into the

1 RPF, though she was still under 24 hour guard. That night, Lyn
2 somehow got away from the security guard ... and disappeared. I
3 have not heard from her or about her since.

4 PROFESSED CONCERNS ABOUT PAST LIVES IS A RED HERRING BECAUSE A
5 SCIENTOLOGIST'S BELIEF IN PAST LIVES IS WIDELY AND PUBLICALLY
6 DISSEMINATED.

7 257. In his declaration, Mr. Moxon takes umbrage that CSI
8 deponents might have to testify about their belief in past lives.
9 (Moxon declaration, page 22)

10 258. There is nothing confidential or secret about past lives
11 in Scientology, except for the OT levels. On the contrary, Hubbard
12 himself wrote at least three publically available books which delve
13 extensively into past lives. They are: (1) Mission Into Time which
14 covers several of Hubbard's claimed past lives, attached hereto as
15 Exhibit 91, including treasure he buried in those lives. The book
16 summarizes a 1968 expedition led by Hubbard to Mediterranean
17 countries to locate and dig up his treasure. I was the Captain of
18 the "Avon River" on that expedition. (2) Have You Lived Before This
19 Life, contains forty-one alleged auditing case histories of past
20 lives, one of which supposedly occurred 23 billion years ago,
21 attached hereto as Exhibit 92, page 238. (3) Scientology: History
22 Of Man, written by Hubbard, states in the Forward: "This is a cold-
23 blooded and factual account of your last sixty trillion years,"
24 attached hereto as Exhibit 93. Hubbard continues: "This is useful
25 knowledge. With it the blind again see, the lame walk, the ill
26 recover, the insane become sane and the sane become saner." The
27 book contains Hubbard's perspective of the history of the human race
28 and describes strange past lives which he claims every person

1 experienced from the beginning of time, including that of the Pilt
2 Down man, later found to be a hoax. All three books are available
3 in major bookstores as well as Public Libraries. They are sold to
4 Scientologists in Organization bookstores, though at far higher
5 prices than in retail stores.

6 259. Hubbard even developed a technique to resolve past life
7 occlusion. In 1975 he wrote a bulletin, "PAST LIFE REMEDIES,"
8 attached herein as Exhibit 94. It states, "There are many remedies
9 and considerable tech developed over the years on the subject of pcs
10 (preclears) unable to go earlier than this life ... The earliest was
11 getting the pc to locate and run imaginary [emphasis added]
12 incidents ... Delusion tends to run off but the real incidents
13 [emphasis added] move into view as well." I ran this 'remedy' on
14 many preclears with mixed results -- some preclears ended up
15 believing they lived in the past and were the identity they found;
16 many did not. I know of many other auditors who did so as well,
17 also with mixed results. It was run on me many times with limited
18 result.

19 260. Getting a Scientologist to believe that what he sees in
20 his mind is valid, is achieved step by step. At first, the lower
21 level grade auditing gets him looking into his mind for this life
22 memories, which he knows are true. As he often also achieves
23 emotional highs in remembering something, his belief that his
24 memories are valid is enhanced. His next step, according to
25 Hubbard, is Dianetic auditing. At this point he may or may not go
26 into past lives. If he does, he more willingly accepts those
27 memories as valid because he knows that the earlier ones were valid.
28 And he will accept 'memories' of past lives including some

1 extraordinary and unbelievable ones. When he finally gets to OT 3
2 and learns that he has spiritual cooties all over him, and if he has
3 been a true believer up to that point, he normally accepts that as
4 well.

5 261. Despite the fact that Scientologists must believe in past
6 lives and be able to audit them to reach the top of Hubbard's
7 Bridge, the CSI attorneys have seen fit to attack the credibility of
8 defendant, Steven Fishman, because he believes in past lives and has
9 a belief he was Malchoot, or the father of Jesus Christ.

10 262. Fishman's belief is exactly the end result a preclear is
11 expected to obtain during his Dianetic session, a belief that he
12 lived as a particular identity some time in the past, often a famous
13 one.

14 263. During the thousands of hours I audited others, a large
15 number of my preclears remembered one or more of their past
16 identities. About ten of my preclears believed they were Jesus
17 Christ, about five believed they were Joan of Ark, four were
18 convinced they lived as George Washington and one as Thomas
19 Jefferson.

20 264. In 1968, I heard Hubbard say that who a preclear believed
21 he was in a past life was unimportant. The importance lay in
22 'rehabilitating' the ability to recover past lives.

23 265. Most former Scientologists refuse to get mental health
24 assistance for years because of Hubbard's belief that Mental Health
25 professionals are destroying mankind and the world - that they are
26 the cause of all illness, and familial, governmental, economic,
27 educational, industrial and financial problems.

28 266. Regular PAP smears and mammograms are not provided in the

1 Sea Org, nor is routine dental care. Hubbard believed he was
2 invulnerable - so do Scientologists.

3 267. Miscavige's attempts to discredit Vaughn and Stacy Young
4 as CSI experts was expected. (Miscavige declaration, page 15) He
5 can do no less. Hubbard insisted that his critics and enemies be
6 discredited, their names blackened, their lives ruined and their
7 deaths demanded. Miscavige, being a true believer, has to follow
8 Hubbard's orders. The Youngs will more than likely, receive more
9 harassment.

10 268. This does not alter the fact that anyone who has served
11 and worked in CSI and the Sea Org as long as Vaughn and Stacy Young,
12 who received the extensive training they have, and held the
13 positions they have, is an expert on CSI and the Sea Org.

14 269. I am sure that in response to this declaration, the
15 Scientologists will further discredit me and manufacture more
16 disclosures about me in their continued "Fair Game" actions to
17 blacken my name and ruin my life. I expect nothing less of them, as
18 they are duty bound to follow Hubbard's directives on their
19 perceived enemies.

20 I declare under penalty of perjury under the laws of the United
21 States of America that the foregoing is true and correct.

22 Executed in Los Angeles, California this 8th day of
23 March, 1994.

24
25 Hana Whitfield
26 Hana Whitfield
27
28

1
2
3 PROOF OF SERVICE

4 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES;

5 I am employed in the County of Los Angeles, state of
6 California. I am over the age of eighteen (18) and not a party to
7 the within action; my business address is: 221 North Figueroa
8 Street, Suite 1200, Los Angeles, California 90012.

9 On March 10, 1994, I served the following document (s)
10 described as: **REVISED DECLARATION OF HANA WHITFIELD RE MOTION FOR**
11 **COSTS** on interested parties in this action by placing the
12 original X a true copy thereof enclosed in a sealed envelope
13 addressed as follows:

14 SEE ATTACHED SERVICE LIST

- 15 () (BY TELECOPIER) I caused such document to be faxed to the
16 addressee.
17 (x) (BY MAIL) I caused such envelope with postage thereon
18 fully prepaid to be placed in the United States Mail at
19 Los Angeles, California.
20 () (BY PERSONAL DELIVERY) I caused such envelope to be
21 delivered by hand to the office of the addressee.
22 () (STATE) I declare under penalty of perjury under the laws
23 of the State of California that the above is true and
24 correct.
25 (X) (FEDERAL) I declare that I am employed in the office of a
26 member of this court at whose direction the service was
27 made.

28 As follows: I am "readily familiar" with the firm's practice
of collection and processing correspondence for mailing. Under
that practice it would be deposited with U.S. Postal Service on
this same day with postage thereon fully prepaid at Los Angeles,
California in the ordinary course of business. I am aware that on
motion of the party served, service is presumed invalid if postal
cancellation date or postage meter date is more than one day after
date of deposit for mailing in affidavit.

(X) I declare under penalty of perjury under the laws of the
State of California that the above is true and correct and that
this declaration was executed on MARCH 10, 1994 at Los Angeles,
California.

(Signature)

CHURCH OF SCIENTOLOGY INTERNATIONAL v. STEVEN FISHMAN, et al.
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Central Orgs.
Franchise

HCO BULLETIN OF MAY 11, AD13

ROUTINE 3
HEAVEN

Well, I have been to Heaven.

And I've found that Scientologists have been to Heaven.

And that everybody has evidently been to Heaven.

The Goals Problem Mass implants, which are the apparent basic source of aberration and human travail, which begin with the goal To Forget, were cynically done "in Heaven".

For a long while, some people have been cross with me for my lack of co-operation in believing in a Christian Heaven, God and Christ. I have never said I didn't disbelieve in a Big Thetan but there was certainly something very corny about Heaven et al. Now I have to apologize. There was a Heaven. Not too unlike, in cruel betrayal, the heaven of the Assassins in the 12th Century who, like everyone else, dramatized the whole track implants - if a bit more so.

Yes, I've been to Heaven. And so have you. And you have the pattern of its implants in the HCO Bulletin Line Plots. It was complete with gates, angels and plaster saints - and electronic implantation equipment. So there was a Heaven after all - which is why you are on this planet and were condemned never to be free again - until Scientology.

Before you went to Heaven you were not really very bad or very good, but you didn't think you had lived only once and you had a good memory and knew who you were and enjoyed life. Afterwards ---

The symbol of the crucified Christ is very apt indeed. It's the symbol of a thetan betrayed.

DATA

Additional work and possible corrections need to be done but this is the gist of the matter:

The implants are electronic in nature and follow the pattern of the G.P.M.

The implant station existed on the order of magnitude of 43,000,000,000,000 years ago. (The dates may be part of the implants but do not appear so at this time. However, a possibility of correction of dates is reserved).

Some have been through it once, some more than once.

The first time I arrived and the moment of the implant To Forget was dated at 43,891,832,611,177 years, 344 days, 10 hours, 20 minutes and 40 seconds from 10:02 $\frac{1}{2}$ PM Daylight Greenwich Time May 9, 1963. The second series was dated to the moment of the implant To Forget as 42,681,459,477,315 years, 132 days, 18 hours, 20 minutes and 15 seconds from 11:02 $\frac{1}{2}$ PM Daylight Greenwich Time May 9, 1963.

There are no earlier such implants. There are no later such implants.

I evidently have a goal of my own at 305 Trillion (U.S.) years and an actual GPM, all of which pulled into this 43 Trillion year implant.

ADDITIONAL E-METER DATA

Five goals in all may be common to both sequences. The first 3 of the 5 are the same. There are no implants as to time according to the meter. There are no numbers in any implants, but dates rocket read. Implanting was done on a non-visible thetan, but arrival was in a ship in a doll body according to the meter. Star of Bethlehem, Pearly Gates, The Way out of the Universe, all of which RR on the meter, give a clue to recruitment actions.

There was no purpose in giving a particular thetan a particular goal. Planning had no individualization.

A preclear's overts should be scouted as to why these implants keyed in, Fac 1, hypnotism, etc. But doubtful if any preclear did this type of implanting.

The mood is set that thetans are evil, treacherous and bad but this is all part of the implant, not factual.

The earliest point of the series is not known at this writing but possibly contains a recruitment through advertising. The departure method from the series is not fully known yet but probably just abandonment.

The implants were not done in a box or in some trick manner of projection. The scenery is actually there, common Mest Universe space and matter and in the Mest Universe.

The first (43 Trillion) series consists of 29 implanted goals.

The second (42 Trillion) series consists of 21 implanted goals.

The first three goals in both series are the same, To Forget, To Remember and To Go Away. The last goal and one other in both series are the same. The remaining goals are not the same for the two implants.

PERSONALLY PERCEIVED DATA.

The pattern of RIs is different for the two series, consisting in the second series of added RIs below the To Have a Goal-ivity and with a different dwindling of adjectives and adverbs, but are otherwise similar.

Both series have the Gates of Heaven visible. The last implant of both consists of "entering" Heaven. The last goal of both is To Be In Heaven.

The gates of the first series are well done, well built. An avenue of statues of saints leads up to them. The gate pillars are surmounted by marble angels. The entering grounds are very well kept, laid out like Bush Gardens in Pasadena, so often seen in the movies. Aside from the implant boxes which lie across from each other on the walk there are other noises and sounds as though the saints are defending and berating. These are unimportant to the incident.

The second series, probably in the same place, shows what a trillion years of overt acts does (or is an additional trickery to collapse one's time). The place is shabby. The vegetation is gone. The pillars are scruffy. The saints have vanished. So have the Angels. A sign on one (the left as you "enter") says "This is Heaven". The right has a sign "Hell" with an arrow and inside the grounds one can see the excavations like archaeological diggings with raw terraces, that lead to "Hell". Plain wire fencing encloses the place. There is a sentry box beside and outside the right pillar. The road "leading up" to the gates is deeply eroded. An effigy of Joseph, complete with desert clothing, is seen approaching the gates (but not moving) leading a donkey which "carries" the original Madonna and child from "Bethlehem". The implanting boxes lie on either side of this "entering" path at path level.

These are the actual ends of the two series. One backs out the gates, of course, from top oppterm down, as this is the end. The last two RIs after this last goal say "it is the beginning", "Not the end".

The place, by implant and inference, was supposed to be in the sky like a floating island. Actually it was simply a high place in the mountains of a planet and the gates pathway falls away into a gorge, very eroded and bare by the time of the second implant, but heavily forested and rolling at the time of the first.

The beginnings have not at this writing been so well explored by myself. I have not viewed the second beginning (which says it is the end). However I do know that the second series was done in long square tunnels with the implant boxes, not unlike small P.A. speakers with fretwork fronts, on either side.

The first series actually begins with arrival in a "town" (as everything is backwards to upset the time sense). This "town" consisted of a trolley bus, some building fronts, sidewalks, train tracks, a boarding house, a bistro in a basement where there is a "bulletin board" well lighted, and a BANK BUILDING.

The bank is the key point of interest. It is interesting that we use the word "bank" (taken actually from computerology) to indicate the reactive mind.

This bank building was the on-the-corner old-fashioned granite-like construction, two or three stories high, with the door in the rounded front - even a revolving type door. Inside to the left of the entrance door is a rounded counter. Directly across the room are THE stairs.

The top oppterm and terminal of To Forget are at the top of these stairs. The implant then proceeds on down the stairs, step by step, terminals on one side (the left if one were coming up the stairs) the oppterm on the other. The first series (43 Trillion) has all its implant impulses at step level. In the second series the boxes are ear high to a man. By the time the gates are arrived at in the first series, the terminals are on the left as you approach the gates, the oppterm on the right, having been reversed at some point.

Contd...

The first (43 Trillion) series had very fine marble stairs. The same stairs can be seen in any big well kept railway station. They were complete with a white ball held in a wrought iron stand.

The thetan was taken along apparently on a pole trap to which he was stuck. It does not proceed step by step throughout the whole of the implant series, but after the first flight of stairs, goes a ways, stops while several pairs of RIs fire then goes to a new location.

The place seemed to have people in it. But they are all effigies. These seem radioactive. Contact with them hurts. No living beings are seen. But effigies that look like humans are performing sudden, repetitive actions with long halts between. In the "basement" such dummies are seen operating machinery.

The boarding house at the actual beginning has a dummy guest and a landlady in kimono and wrappers, reading a newspaper.

There are no devils or satans that I saw.

There is a passenger getting on the trolley bus, a "workman" halfway down the first stairs of "To Forget" eating lunch" and in To Be in Heaven a gardener or electrician adjusting an implant box behind a hedge and periodically leaping up and screaming.

The place, so long as the implants remain only partially discharged, seems to swim in white and black electronic masses, but these dissipate as the implants are run out by pattern.

One actually "enters" the "town" as the first action. The implants, however, were rigged to make the gates seem the entrance to the incident. One backs through from the town, into the bank, down the steps and eventually out the Pearly Gates, down the hillside and is there let off and abandoned. One might have had a body or its remains at the town but has none when abandoned.

"TO BE IN HEAVEN" is the last goal implanted in both series. The goal may be slightly differently worded in the second series.

This is not a body building implant, though running it gives somatics to chest.

This is not a GE implant. It is the person's own. Running it, particularly badly, brings it down on the body. There are body somatics on it, however, particularly eyes, face, chest, bones.

It apparently only can be run by 3M listing and Rocket Reads. One must have the goal to get the RIs.

CONCLUSIONS.

The place is so full of lies by implant that the preclear becomes quite confused and this review of the actual data is necessary to a successful navigation. However, it is very easy to read more treachery into it than there is in it - which is enough.

However, as the place existed so long it was in a varying state of repair and some change. (This data on time is subject to review). But in 1.2 Trillion years only some of the implant pattern and mock up had shifted. However, there may have been other stations. Only time and research will really tell that.

One must date the preclear's first (earliest) goal to forget, find how many times the preclear went through it, or some such implant station, date the other times and be careful to run only the first of the first series. As this is basic, as in Prepchecking, Sec Checking and old engram running, it tends to ease up the remainder of the implants. But running the implants later than basic is very much harder on the pc even though it can be done. Wherever one misses an RI in an early implant, that repeated RI when found in a later one tends to be very much more heavily charged.

Re-running any implant that has only been partially run tends to rough up the whole implant and make it hard to run.

LUCK

I think we are lucky. It could have been much worse. This Heavenly dream of destruction could have been current, not so long ago. It could have happened often, not just once or twice or three times per pc. But apparently it didn't and is unique in itself.

This is the core of the Reactive Mind. It is all the way South. For here, just once on the whole track, somebody discovered the mechanism of purposes and RIs

Contd....

and utilized them to install religious mania and pin thetans down to "one life" and planets.

The thing was done so well that it has hung up ever since. There are other implants, there are other goals and GPMs, but these are minor and easily found and listed once this key implant series is out of the way.

We were in a position of having an infinite number of pieces to the puzzle. Now we have a finite number which even though very tough are still finite in number. Further, every processing step taken, every RI discharged is a positive gain toward a definite finite result in processing.

Further, we have our hands on an appalling bit of technology where the world is concerned. With rapidity and a Meter it can be shown that Heaven is a false dream and that the old religion was based on a very painful lie, a cynical betrayal.

What does this do to any religious nature of Scientology? It strengthens it. New religions always overthrow the false gods of the old, they do something to better man. We can improve man. We can show the old gods false. And we can open up the universe as a happier place in which a spirit may dwell. What more can you expect? This actually places us far beyond any other beings that are about. It puts us, through increased beingness and a restoration of life, in control of much destiny.

We have now only a few unsolved problems about life, huge though they may be, such as the construction of bodies and how does one establish the character of and communicate, if feasible, with beings who are making trees and insects. There are a few things like these. But I imagine when we finally manage to communicate with beetles under rocks and free them, we'll no doubt find the Creator of Heaven who 43 + Trillion years ago designed and built the Pearly Gates and entrapped us all.

Good Lord, I'd hate to be guilty of that overt. But never mind - you aren't either. That guy is GONE (I hope!)

L. RON HUBBARD

(Note: This HCO Bulletin is based on over a thousand hours of research auditing, analyzing the facsimiles of the reactive mind, and with the help of a Mark V Electrometer. It is scientific research and is not in any way based upon the mere opinion of the researcher. This HCO Bulletin is not the result of the belief or beliefs of anyone. Scientology data reflects long, arduous and painstaking research over a period of some thirty years into the nature of Man, the mind, the human spirit and its relationship to the physical universe. The data and phenomena discovered in Scientology is common to all minds and all men and can be demonstrated on anyone. Truth does not require belief to be truth any more than water requires anyone's permission to run down hill. The data is itself and can be duplicated by any honest researcher or practitioner. We in Scientology seek freedom, the betterment of Man, and the happiness of the individual and this comprises our attitude toward the data found. The data, however, is simply itself, and exists whatever the opinion of anyone may be. The contents of this HCO Bulletin discover the apparent underlying impulses of religious zealotism and the source of the religious mania and insanity which terrorized Earth over the ages and has given religion the appearance of insanity. As the paper is written for my friends it has, of course, a semblance of irreverence).

(Note: All our data on the whole track remains factual and is not taken from any implant. The only error released earlier was the time factors involved in GPMs).

HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex

HCO BULLETIN OF 23 SEPTEMBER 1968

Class VIII

C O N F I D E N T I A L

RESISTIVE CASES
FORMER THERAPY

Hypnotism, "psycho" analysis, "psychiatry" and other implant type therapies often key-in and jam the track.

These characters here, on any other planet and on the whole track dramatize implanting. The "therapy" involved would be a temporary relief brought by suggestion.

The wrong data of the "science" itself operates as a whole track lie. Getting well or able depends on establishing truth. These "scientific" lies are alterations of actual laws.

We often note electronics men have a rough case time. This traces to the lies Man uses for his "electrical science". As the subject is based on false assumptions, it itself tends to aberrate.

Therefore we get out of the road any former "therapy". We can rehab any moment of release in it, handle any overrun, etc.

We also do a new style Remedy B to get old therapies spotted and run back.

The only cases which hang up are

- (1) Unaudited cases (lies about grades, etc)
- (2) Drug cases (who seek in processing the delusion or madness which exhilarated them on drugs).
- (3) Former therapy cases. (In this or past lives.)
- (4) Out of valence cases.
- (5) Cases who continue to commit overts on Sch.
- (6) Case "audited" with their ruds or grades out.
- (7) Seriously physically ill cases (where the illness makes too much PTP in PT).

Of all these the former therapy case is apt to be the roughest as any auditing session can be reactively mistaken for the "treatment". The next roughest is the drug case as a false exteriorization often occurs on an enforced basis and may go into restim.

Old therapies include the 2000 yr ago plus or minus Aescupleian drug treatment (hillabore) which produced a convulsion and coma and in which the nut practitioner made up as a God and "visited" the patient in a "dream". This outfit was all over the ancient world.

Also the Christian Church used (and uses) implanting (with a squirrel version of the "7s"). These gangsters were the Nicomidians from lower Egypt who were chased out for criminal practices (implanting officials). They took over the Niocene Creed before the year zero, invented Christ (who comes from the crucifixion in R6 75m years ago) and implanted their way to "power". The original Nicomidians date about 600 BC and people who were Christ data at 75 m years ago.

These were drug "therapies", actually implants.

Some drug takers go plowing back into early implants and drug therapies so the two get crossed up on a case.

To isolate the reason for a highly resistive case or high TA you can assess the above 7 items and get a clue. Don't limit it to this lifetime. And don't do it so as to key the person in hard on things he wasn't in. And don't do it unless the case is very hard to get a gain on.

Engram running of a crude sort can be found hundreds, thousands or billions of years ago and consists if it appears, of an overrun. They didn't know much about it and overran them badly.

Implants, psychoanalysis, psychiatry, hypnotism gets all sharpened up with sex as these birds would commonly (and do) stage insane sex scenes. They violate the children and wives of officials even today to produce a degrade and to make a scene so insane that the "patient" if he remembers it really thinks he is insane. And if he tries to tell anybody (or if she tries to tell her husband) it's a prompt mess. So these "practitioners" hide their activities in this fashion.

The trouble with such former "therapies" and electric shock, etc. is that it

(a) groups track by the command of the practitioner

(b) appears to be a grouped track because Body Thetans flash their pictures at the moment it happens and so makes multiple pictures and hides the real scene, or

(c) sends the pc to the start of track WAY back and sticks him there out of PT.

The keynote of piloting through messes like this is to A. Know what kind of a mess it is and B. Don't EVER force a pc back track or into anything he doesn't want to confront easily.

Drugs force the person back into these messes and stick him.

One of these former therapy or drug messes is only hard to untangle because they are full of incredibles. The pc doesn't accept them or just try to see what's in them.

The basic rule in any case is reality is proportional to the amount of charge removed and so Reality can be increased simply by removing charge. Those surges of the needle as well as the BDs of the TA are "charge coming off."

Anything eventually resolves if the pc just keeps on getting charge off.

The earliest charge is the most important.

Charge off the exact grades is the most valuable.

But ANY charge off will make it, even on former "therapies"

L. RON HUBBARD

LRH:jpt:gn
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6 In Propria Persona

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL,) No. 157 680
a California not-for-profit)
religious corporation,)

Plaintiff,)

vs.)

GERALD ARMSTRONG; MICHAEL WALTON;)
THE GERALD ARMSTRONG CORPORATION)
a California for-profit)
corporation; DOES 1 through 100,)
inclusive,)

Defendants.)

**DECLARATION OF
DENNIS ERlich
IN OPPOSITION TO
MOTIONS FOR SUMMARY
ADJUDICATION OF 20TH
CAUSE OF ACTION; AND
13TH, 16TH, 17TH &
19TH CAUSES OF ACTION
OF SECOND AMENDED
COMPLAINT**

Date: 4/21/95
Time: 9:00 a.m.
Dept: One
Trial: 5/18/95

1
2 DECLARATION OF DENNIS ERLICH

3 I, Dennis Erlich, declare:

4 1. I am over the age of 18 years. I am a resident of
5 the State of California. I have personal knowledge of the
6 matters set forth herein, and if called upon as a witness I
7 could testify competently thereto.

8 2. I was member of Scientology from 1968 to 1982. I
9 studied and was extensively trained in all of the bulletins,
10 policies, directives, other writings and taped lectures, of
11 Scientology's founder and leader, L. Ron Hubbard, concerning
12 his psychotherapy ("auditing") and the training of
13 Scientology's psychotherapists ("auditors"). In 1977 I was
14 posted personally by Hubbard as the Chief Cramming Officer,
15 Flag, responsible for the training and correction of the
16 highest level auditors, training supervisors and "case
17 supervisors," those people who directed Scientology's auditing
18 of its members, in the whole Scientology world.

19 3. During my time in Scientology I read and studied
20 Hubbard's bulletins and other writings concerning Christ,
21 Christianity and God. True and correct copies of two of his
22 bulletins, "Routine 3 Heaven," dated May 11, 1963, and
23 "Resistive Cases Former Therapy," dated September 23, 1968,
24 are appended hereto as Exhibits A and B respectively.

25 4. These bulletins are consistent with Hubbard's other
26 writings for indoctrinated Scientologists on the subjects of
27 Christianity and God. Hubbard taught that the ideas of
28

1
2 Christ, Heaven and God are electronically installed "implants"
3 in humans' minds by "implanters" at "implant stations" for the
4 humans' enslavement. Hubbard also taught that only
5 Scientology could remove these implants and rescue humans from
6 this religious enslavement.

7 5. Inside Scientology at the organizational level in
8 which I worked, it was accepted that anyone who believed in
9 Jesus Christ or God, or who prayed to a Supreme Being was
10 dramatizing an implant. Such a person was considered a
11 "former therapy case" or "resistive case." He was not trusted
12 in the organization, and as long as he remained, the efforts
13 of his auditor and case supervisor were to destroy his belief
14 in his religion, Christ or God. Such a person, if he
15 continued his belief in Christ or God, was labelled "PTS Type
16 III," Hubbard's designation for a "psychotic."

17 6. Hubbard and Scientology claimed to Scientologists
18 and to people considering buying "services" that he had
19 discovered and developed his psychotherapy techniques through
20 scientific research and that the promises of Scientology
21 auditing; e.g., increased IQ, cure of diseases and increased
22 abilities, were scientifically proven and guaranteed.
23 Scientology also claimed and claims in the media and in the
24 legal arena, in order to avoid liability for not delivering on
25 its promises, that the organization is a religion organized
26 solely for religious purposes. Scientology claims as well
27 that everything written by Hubbard about Scientology,
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1
2 including its financial and management policies, its
3 intelligence training policies, its "black propaganda"
4 policies directing and calling for character assassination,
5 its policies calling for the use of the law to harass, and its
6 policies calling for antisocial and criminal acts against
7 critics, including Hubbard's "fair game" policy, are religious
8 scriptures.

9 7. Scientology claims that the "fair game" policy was
10 canceled and its practices, which included theft, trickery,
11 cheating, lying, suing and destroying labelled "enemies" has
12 been discontinued. It hasn't. I have been "fair game" for
13 years. Scientology has carried out a black propaganda
14 campaign to destroy my reputation, it has stolen my property,
15 and it has sued me. Scientology, as presently directed by its
16 leaders, has no respect for civil rights and is utterly
17 ruthless in its efforts to crush, through financial, public
18 relations, legal and extra-legal means anyone its leaders
19 perceive as threats to their goal of world wide power.

20 8. I am familiar with the information about Hubbard's
21 misrepresentations about his past and his promises, and some
22 of the noxious practices of Scientology, which was made public
23 for the first time through the efforts of Gerry Armstrong,
24 particularly during his trial in 1984 before Los Angeles
25 Superior Court Judge Paul Breckenridge. This information was
26 important in my becoming free from Scientology's mind control,
27 and I know it has been important for many others as well. I
28

1
2 am also familiar with Scientology's efforts to destroy
3 Armstrong's credibility so he and his information would not be
4 believed, and to silence him through the courts so that the
5 organization could say whatever it wants about him without his
6 being able to respond. This is what fair game is all about.
7 It would be a black day for people of good will and free minds
8 everywhere if Scientology is successful in these efforts.

9 I declare under the penalty of perjury under the laws of
10 the California that the foregoing is true and correct.

11 Executed in GLENDALE, California this 6TH
12 day of APRIL, 1995.

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14 Dennis Erlich
15 Dennis Erlich
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HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex.

Central Orgs.
Franchise

HCO BULLETIN OF MAY 11, AD13

ROUTINE 3
HEAVEN

Well, I have been to Heaven.

And I've found that Scientologists have been to Heaven.

And that everybody has evidently been to Heaven.

The Goals Problem Mass implants, which are the apparent basic source of aberration and human travail, which begin with the goal To Forget, were cynically done "in Heaven".

For a long while, some people have been cross with me for my lack of co-operation in believing in a Christian Heaven, God and Christ. I have never said I didn't disbelieve in a Big Thetan but there was certainly something very corny about Heaven et al. Now I have to apologize. There was a Heaven. Not too unlike, in cruel betrayal, the heaven of the Assassins in the 12th Century who, like everyone else, dramatized the whole track implants - if a bit more so.

Yes, I've been to Heaven. And so have you. And you have the pattern of its implants in the HCO Bulletin Line Plots. It was complete with gates, angels and plaster saints - and electronic implantation equipment. So there was a Heaven after all - which is why you are on this planet and were condemned never to be free again - until Scientology.

Before you went to Heaven you were not really very bad or very good, but you didn't think you had lived only once and you had a good memory and knew who you were and enjoyed life. Afterwards ---

The symbol of the crucified Christ is very apt indeed. It's the symbol of a thetan betrayed.

DATA

Additional work and possible corrections need to be done but this is the gist of the matter:

The implants are electronic in nature and follow the pattern of the G.P.M.

The implant station existed on the order of magnitude of 43,000,000,000,000 years ago. (The dates may be part of the implants but do not appear so at this time. However, a possibility of correction of dates is reserved).

Some have been through it once, some more than once.

The first time I arrived and the moment of the implant To Forget was dated at 43,891,832,611,177 years, 344 days, 10 hours, 20 minutes and 40 seconds from 10:02½ PM Daylight Greenwich Time May 9, 1963. The second series was dated to the moment of the implant To Forget as 42,681,459,477,315 years, 132 days, 18 hours, 20 minutes and 15 seconds from 11:02½ PM Daylight Greenwich Time May 9, 1963.

There are no earlier such implants. There are no later such implants.

I evidently have a goal of my own at 305 Trillion (U.S.) years and an actual GPM, all of which pulled into this 43 Trillion year implant.

ADDITIONAL E-METER DATA

Five goals in all may be common to both sequences. The first 3 of the 5 are the same. There are no implants as to time according to the meter. There are no numbers in any implants, but dates rocket read. Implanting was done on a non-visible thetan, but arrival was in a ship in a doll body according to the meter. Star of Bethlehem, Pearly Gates, The Way out of the Universe, all of which RR on the meter, give a clue to recruitment actions.

There was no purpose in giving a particular thetan a particular goal. Planning had no individualization.

A preclear's overts should be scouted as to why these implants keyed in, Fac 1, hypnotism, etc. But doubtful if any preclear did this type of implanting.

The mood is set that thetans are evil, treacherous and bad but this is all part of the implant, not factual.

The earliest point of the series is not known at this writing but possibly contains a recruitment through advertising. The departure method from the series is not fully known yet but probably just abandonment.

Contd...

The implants were not done in a box or in some trick manner of projection. The scenery is actually there, common Mest Universe space and matter and in the Mest Universe.

The first (43 Trillion) series consists of 29 implanted goals.

The second (42 Trillion) series consists of 21 implanted goals.

The first three goals in both series are the same, To Forget, To Remember and To Go Away. The last goal and one other in both series are the same. The remaining goals are not the same for the two implants.

PERSONALLY PERCEIVED DATA.

The pattern of RIs is different for the two series, consisting in the second series of added RIs below the To Have a Goal-ivity and with a different dwindling of adjectives and adverbs, but are otherwise similar.

Both series have the Gates of Heaven visible. The last implant of both consists of "entering" Heaven. The last goal of both is To Be In Heaven.

The gates of the first series are well done, well built. An avenue of statues of saints leads up to them. The gate pillars are surmounted by marble angels. The entering grounds are very well kept, laid out like Bush Gardens in Pasadena, so often seen in the movies. Aside from the implant boxes which lie across from each other on the walk there are other noises and sounds as though the saints are defending and berating. These are unimportant to the incident.

The second series, probably in the same place, shows what a trillion years of overt acts does (or is an additional trickery to collapse one's time). The place is shabby. The vegetation is gone. The pillars are scruffy. The saints have vanished. So have the Angels. A sign on one (the left as you "enter") says "This is Heaven". The right has a sign "Hell" with an arrow and inside the grounds one can see the excavations like archaeological diggings with raw terraces, that lead to "Hell". Plain wire fencing encloses the place. There is a sentry box beside and outside the right pillar. The road "leading up" to the gates is deeply eroded. An effigy of Joseph, complete with desert clothing, is seen approaching the gates (but not moving) leading a donkey which "carries" the original Madonna and child from "Bethlehem". The implanting boxes lie on either side of this "entering" path at path level.

These are the actual ends of the two series. One backs out the gates, of course, from top oppterm down, as this is the end. The last two RIs after this last goal say "it is the beginning", "Not the end".

The place, by implant and inference, was supposed to be in the sky like a floating island. Actually it was simply a high place in the mountains of a planet and the gates pathway falls away into a gorge, very eroded and bare by the time of the second implant, but heavily forested and rolling at the time of the first.

The beginnings have not at this writing been so well explored by myself. I have not viewed the second beginning (which says it is the end). However I do know that the second series was done in long square tunnels with the implant boxes, not unlike small P.A. speakers with fretwork fronts, on either side.

The first series actually begins with arrival in a "town" (as everything is backwards to upset the time sense). This "town" consisted of a trolley bus, some building fronts, sidewalks, train tracks, a boarding house, a bistro in a basement where there is a "bulletin board" well lighted, and a BANK BUILDING.

The bank is the key point of interest. It is interesting that we use the word "bank" (taken actually from computerology) to indicate the reactive mind.

This bank building was the on-the-corner old-fashioned granite-like construction, two or three stories high, with the door in the rounded front - even a revolving type door. Inside to the left of the entrance door is a rounded counter. Directly across the room are THE stairs.

The top oppterm and terminal of To Forget are at the top of these stairs. The implant then proceeds on down the stairs, step by step, terminals on one side (the left if one were coming up the stairs) the oppterm on the other. The first series (43 Trillion) has all its implant impulses at step level. In the second series the boxes are ear high to a man. By the time the gates are arrived at in the first series, the terminals are on the left as you approach the gates, the oppterm on the right, having been reversed at some point.

Contd...

The first (43 Trillion) series had very fine marble stairs. The same stairs can be seen in any big well kept railway station. They were complete with a white ball held in a wrought iron stand.

The thetan was taken along apparently on a pole trap to which he was stuck. It does not proceed step by step throughout the whole of the implant series, but after the first flight of stairs, goes a ways, stops while several pairs of RIs fire then goes to a new location.

The place seemed to have people in it. But they are all effigies. These seem radioactive. Contact with them hurts. No living beings are seen. But effigies that look like humans are performing sudden, repetitive actions with long halts between. In the "basement" such dummies are seen operating machinery.

The boarding house at the actual beginning has a dummy guest and a landlady in kimono and wrappers, reading a newspaper.

There are no devils or satans that I saw.

There is a passenger getting on the trolley bus, a "workman" halfway down the first stairs of "To Forget "eating lunch" and in To Be in Heaven a gardener or electrician adjusting an implant box behind a hedge and periodically leaping up and screaming.

The place, so long as the implants remain only partially discharged, seems to swim in white and black electronic masses, but these dissipate as the implants are run out by pattern.

One actually "enters" the "town" as the first action. The implants, however, were rigged to make the gates seem the entrance to the incident. One backs through from the town, into the bank, down the steps and eventually out the Pearly Gates, down the hillside and is there let off and abandoned. One might have had a body or its remains at the town but has none when abandoned.

"TO BE IN HEAVEN" is the last goal implanted in both series. The goal may be slightly differently worded in the second series.

This is not a body building implant, though running it gives somatics to chest.

This is not a GE implant. It is the person's own. Running it, particularly badly, brings it down on the body. There are body somatics on it, however, particularly eyes, face, chest, bones.

It apparently only can be run by 3M listing and Rocket Reads. One must have the goal to get the RIs.

CONCLUSIONS.

The place is so full of lies by implant that the preclear becomes quite confused and this review of the actual data is necessary to a successful navigation. However, it is very easy to read more treachery into it than there is in it - which is enough.

However, as the place existed so long it was in a varying state of repair and some change. (This data on time is subject to review). But in 1.2 Trillion years only some of the implant pattern and mock up had shifted. However, there may have been other stations. Only time and research will really tell that.

One must date the preclear's first (earliest) goal to forget, find how many times the preclear went through it, or some such implant station, date the other times and be careful to run only the first of the first series. As this is basic, as in Prepchecking, Sec Checking and old engram running, it tends to ease up the remainder of the implants. But running the implants later than basic is very much harder on the pc even though it can be done. Wherever one misses an RI in an early implant, that repeated RI when found in a later one tends to be very much more heavily charged.

Re-running any implant that has only been partially run tends to rough up the whole implant and make it hard to run.

LUCK

I think we are lucky. It could have been much worse. This Heavenly dream of destruction could have been current, not so long ago. It could have happened often, not just once or twice or three times per pc. But apparently it didn't and is unique in itself.

This is the core of the Reactive Mind. It is all the way South. For here, just once on the whole track, somebody discovered the mechanism of purposes and RIs

Contd....

and utilized them to install religious mania and pin thetans down to "one life" and planets.

The thing was done so well that it has hung up ever since. There are other implants, there are other goals and GPMs, but these are minor and easily found and listed once this key implant series is out of the way.

We were in a position of having an infinite number of pieces to the puzzle. Now we have a finite number which even though very tough are still finite in number. Further, every processing step taken, every RI discharged is a positive gain toward a definite finite result in processing.

Further, we have our hands on an appalling bit of technology where the world is concerned. With rapidity and a Meter it can be shown that Heaven is a false dream and that the old religion was based on a very painful lie, a cynical betrayal.

What does this do to any religious nature of Scientology? It strengthens it. New religions always overthrow the false gods of the old, they do something to better man. We can improve man. We can show the old gods false. And we can open up the universe as a happier place in which a spirit may dwell. What more can you expect? This actually places us far beyond any other beings that are about. It puts us, through increased beingness and a restoration of life, in control of much destiny.

We have now only a few unsolved problems about life, huge though they may be, such as the construction of bodies and how does one establish the character of and communicate, if feasible, with beings who are making trees and insects. There are a few things like these. But I imagine when we finally manage to communicate with beetles under rocks and free them, we'll no doubt find the Creator of Heaven who 43 + Trillion years ago designed and built the Pearly Gates and entrapped us all.

Good Lord, I'd hate to be guilty of that overt. But never mind - you aren't either. That guy is GONE (I hope!)

L. RON HUBBARD

(Note: This HCO Bulletin is based on over a thousand hours of research auditing, analyzing the facsimiles of the reactive mind, and with the help of a Mark V Electrometer. It is scientific research and is not in any way based upon the mere opinion of the researcher. This HCO Bulletin is not the result of the belief or beliefs of anyone. Scientology data reflects long, arduous and painstaking research over a period of some thirty years into the nature of Man, the mind, the human spirit and its relationship to the physical universe. The data and phenomena discovered in Scientology is common to all minds and all men and can be demonstrated on anyone. Truth does not require belief to be truth any more than water requires anyone's permission to run down hill. The data is itself and can be duplicated by any honest researcher or practitioner. We in Scientology seek freedom, the betterment of Man, and the happiness of the individual and this comprises our attitude toward the data found. The data, however, is simply itself, and exists whatever the opinion of anyone may be. The contents of this HCO Bulletin discover the apparent underlying impulses of religious zealotism and the source of the religious mania and insanity which terrorized Earth over the ages and has given religion the appearance of insanity. As the paper is written for my friends it has, of course, a semblance of irreverence).

(Note: All our data on the whole track remains factual and is not taken from any implant. The only error released earlier was the time factors involved in GPMs).

HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex

HCO BULLETIN OF 23 SEPTEMBER 1958

Class VIII

C O N F I D E N T I A L

RESISTIVE CASES
FORMER THERAPY

Hypnotism, "psycho" analysis, "psychiatry" and other implant type therapies often key-in and jam the track.

These characters here, on any other planet and on the whole track dramatize implanting. The "therapy" involved would be a temporary relief brought by suggestion.

The wrong data of the "science" itself operates as a whole track lie. Getting well or able depends on establishing truth. These "scientific" lies are alterations of actual laws.

We often note electronics men have a rough case time. This traces to the lies Man uses for his "electrical science". As the subject is based on false assumptions, it itself tends to aberrate.

Therefore we get out of the road any former "therapy". We can rehab any moment of release in it, handle any overrun, etc.

We also do a new style Remedy B to get old therapies spotted and run back.

The only cases which hang up are

- (1) Unaudited cases (lies about grades, etc)
- (2) Drug cases (who seek in processing the delusion or madness which exhilarated them on drugs).
- (3) Former therapy cases. (In this or past lives.)
- (4) Out of valence cases.
- (5) Cases who continue to commit overts on Sen.
- (6) Case "audited" with their ruds or grades out.
- (7) Seriously physically ill cases (where the illness makes too much PTP in PT).

Of all these the former therapy case is apt to be the roughest as any auditing session can be reactively mistaken for the "treatment". The next roughest is the drug case as a false exteriorization often occurs on an enforced basis and may go into restim.

Old therapies include the 2000 yr ago plus or minus Aescupleian drug treatment (hillabore) which produced a convulsion and coma and in which the nut practitioner made up as a God and "visited" the patient in a "dream". This outfit was all over the ancient world.

Also the Christian Church used (and uses) implanting (with a squirrel version of the "7s"). These gangsters were the Nicomidians from lower Egypt who were chased out for criminal practices (implanting officials). They took over the Niocene Creed before the year zero, invented Christ (who comes from the crucifixion in R6 75m years ago) and implanted their way to "power". The original Nicomidians date about 600 BC and people who were Christ data at 75 m years ago.

These were drug "therapies", actually implants.

Some drug takers go plowing back into early implants and drug therapies so the two get crossed up on a case.

To isolate the reason for a highly resistive case or high TA you can assess the above 7 items and get a clue. Don't limit it to this lifetime. And don't do it so as to key the person in hard on things he wasn't in. And don't do it unless the case is very hard to get a gain on.

Engram running of a crude sort can be found hundreds, thousands or billions of years ago and consists if it appears, of an overrun. They didn't know much about it and overran them badly.

Implants, psychoanalysis, psychiatry, hypnotism gets all sharled up with sex as these birds would commonly (and do) stage insane sex scenes. They violate the children and wives of officials even today to produce a degrade and to make a scene so insane that the "patient" if he remembers it really thinks he is insane. And if he tries to tell anybody (or if she tries to tell her husband) it's a prompt mess. So these "practitioners" hide their activities in this fashion.

The trouble with such former "therapies" and electric shock, etc. is that it

(a) groups track by the command of the practitioner

(b) appears to be a grouped track because Body Thetans flash their pictures at the moment it happens and so makes multiple pictures and hides the real scene, or

(c) sends the pc to the start of track WAY back and sticks him there out of PT.

The keynote of piloting through messes like this is to A. Know what kind of a mess it is and B. Don't EVER force a pc back track or into anything he doesn't want to confront easily.

Drugs force the person back into these messes and stick him.

One of these former therapy or drug messes is only hard to untangle because they are full of incredibles. The pc doesn't accept them or just try to see what's in them.

The basic rule in any case is reality is proportional to the amount of charge removed and so Reality can be increased simply by removing charge. Those surges of the needle as well as the EDs of the TA are "charge coming off."

Anything eventually resolves if the pc just keeps on getting charge off.

The earliest charge is the most important.

Charge off the exact grades is the most valuable.

But ANY charge off will make it, even on former "therapies"

L. RON HUBBARD

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6 In Propria Persona

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA

8 FOR THE COUNTY OF MARIN

9 CHURCH OF SCIENTOLOGY INTERNATIONAL,))
10 a California not-for-profit))
11 religious corporation,))

12 Plaintiff,

13 vs.

14 GERALD ARMSTRONG; MICHAEL WALTON;
15 THE GERALD ARMSTRONG CORPORATION
16 a California for-profit))
17 corporation; DOES 1 through 100,))
18 inclusive,))

19 Defendants.

No. 157 680

DECLARATION OF
MARGERY WAKEFIELD
IN OPPOSITION TO
MOTIONS FOR SUMMARY
ADJUDICATION OF 20TH
CAUSE OF ACTION; AND
13TH, 16TH, 17TH &
19TH CAUSES OF ACTION
OF SECOND AMENDED
COMPLAINT

Date: 4/21/95
Time: 9:00 a.m.
Dept: One
Trial: 5/18/95

1
2 DECLARATION OF MARGERY WAKEFIELD

3 I, Margery Wakefield, declare:

4 1. I am over the age of 18 years. I am a resident of
5 the State of Florida. I have personal knowledge of the
6 matters set forth herein, and if called upon as a witness I
7 could testify competently thereto.

8 2. I was a member of Scientology from 1968 to 1980.

9 3. In 1982, I filed a lawsuit, Margery Wakefield v.
10 Church of Scientology of California, United States District
11 Court for the Middle District of Florida, Case No. 82-1313-
12 Civ-T-10 for various wrongful acts committed against me.

13 4. In settlement of that case in 1986 I had to sign a
14 document which prohibited me from thereafter discussing
15 Scientology with anyone. I did not know that I was signing
16 away such a right, nor that Scientology could later come after
17 me with the aid of the courts to punish me for discussing my
18 knowledge of the organization.

19 5. After leaving Scientology I became a Christian. I
20 believe that I am saved by the Grace of God through my faith
21 in His Son Jesus Christ. I also believe that I was called to
22 speak out concerning the illegal practices of Scientology, its
23 mind control techniques, and its anti-Christian nature and
24 teachings. Appended hereto as Exhibit A is a true and correct
25 copy of an essay I recently wrote entitled "What Christians
26 Need To Know About Scientology." I have been motivated in
27 speaking my thoughts based on my knowledge and experiences by
28

1
2 the desire to reach the minds of people who are in Scientology
3 and held by its anti-Christian mind control and pseudo-
4 scientific dogma, and the minds of people who might be drawn
5 into Scientology by its misrepresentations concerning its
6 intentions, practices and religion. I believe that it is
7 every Christian's motivation and desire to reach the unsaved
8 with the message of the true gospel and a warning about false
9 teachers like L. Ron Hubbard and false gospels like
10 Scientology. I have felt that the right to speak and teach in
11 this way is something that no court in this country should nor
12 can take away.

13 6. I know that Scientology says it is a religion, that
14 what it is engaged in is religious practice, and that all of
15 its writings on Scientology are religious scripture. Even
16 according to Scientology's use of the terms "religion" and
17 "religious," therefore, I believe that under the US
18 Constitution I would be free to speak and could not contract
19 away my right to speak about those religious scriptures,
20 practices and experiences. But I also believe that what I
21 experienced in Scientology were my own religious experiences,
22 and what I experienced regarding Scientology after leaving are
23 my own religious experiences, about which I cannot be
24 silenced.

25 7. Indeed, Scientology's attacks on me and its efforts
26 to silence me after the "settlement" motivated me further,
27 even at great risk to myself and my freedoms, to do what I had
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1
2 been called to do. Appended hereto as Exhibit B is a true and
3 correct copy of a document filed in my case in 1993 by
4 Scientology entitled "Motion for order to show cause why
5 plaintiff should not be held in criminal contempt." In this
6 motion, which is still pending, Scientology seeks to have me
7 jailed for up to twenty-two years for speaking about
8 Scientology.

9 8. I want this court to know that I am at great risk in
10 providing Gerald Armstrong with a declaration to support his
11 opposition to Scientology's effort to silence him. I do not
12 wish Scientology to further threaten or attack me. I believe,
13 however, that everyone should be free to speak his thoughts,
14 that the knowledge Armstrong has should not be silenced, and
15 that the use of the courts by Scientology to silence its
16 perceived critics, and thus be free to promote its anti-
17 Christian religion should be opposed.

18 I declare under the penalty of perjury under the laws of
19 the United States and California that the foregoing is true
20 and correct.

21 Executed at Tampa, Florida this 7th
22 day of April, 1995.

23
24 Margery Wakefield
25 Margery Wakefield
26
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WHAT CHRISTIANS NEED TO KNOW ABOUT SCIENTOLOGY

"For those of you whose Christian toes I may have stepped on, let me take the opportunity to disabuse you of some lovely myths. For instance, the historic Jesus was not nearly the sainted figure (he) has been made out to be. In addition to being a lover of young boys and men, he was given to uncontrollable bursts of temper and hatred... You have only to look at the history his teachings inspired to see where it all inevitably leads. It is historic fact and yet man still clings to the ideal, so deep and insidious is the biologic implanting...."

"No doubt you are familiar with the Revelations (sic) section of the Bible where various events are predicted. Also mentioned is a brief period of time in which the arch-enemy of Christ, referred to as the anti-Christ, will reign and his opinions will have sway... this anti-Christ represents the forces of Lucifer (literally, the "light-bearer" or "light-bringer"), Lucifer being a mythical representation of the forces of enlightenment... My mission could be said to fulfill the Biblical promise represented by this brief anti-Christ period."

L. Ron Hubbard, Student Briefing, OT VIII Series I

1. INTRODUCTION

The controversial Church of Scientology had its beginnings in 1950 with the publication of the book *Dianetics: The Modern Science of Mental Health* by L. Ron Hubbard.

According to Dianetic theory, the mind is composed of mental image pictures of every event in a person's life. Memories, or pictures, of painful events from the past containing pain or unconsciousness are known in Dianetics as "engrams." By recalling and "erasing" these memories a person can be restored to perfect physical and mental health and analytical functioning. A person whose engrams have all been erased is called a "Clear."

It is the purpose of Scientology to "clear the planet." In other words, that every person in the world will eventually be cleared of his engrams through Dianetic "processing."

By 1954, Hubbard had "discovered" that in order to be truly "clear," a person also had to erase all the engrams from his hundreds of past lives. The new science of Scientology was founded and organized as a religion to incorporate this belief. Sooner or later, most people in Scientology will begin to "remember" (imagine) their past lives.

Scientologists do believe in reincarnation, which is an occult belief.

According to the theology of Scientology, a person is actually an invisible entity, similar to the soul in Christianity. This entity in Scientology is known as the "thetan."

As the thetan becomes relieved of his engrams, he will regain the many godlike powers that are inherently his - powers such as telepathy, "exteriorization" (the ability to be separate from his body with full perception), telekinesis (the ability to move objects with thought), etc. The belief in Scientology is that we were once godlike, and that we have deteriorated over time. The promise of Scientology is that through Scientology counseling, called "auditing," the person can regain these godlike abilities.

A thetan who has been restored to a godlike state is known in Scientology as an "operating thetan," or "OT" (pronounced "oh-tee"). People in Scientology spend exorbitant fees, sometimes as much as \$1000 per hour, to attain the exalted state of OT.

Death in Scientology is known as "dropping the body." According to Scientology theory, when a person dies, he (the thetan, or spirit) has been pre-programmed to "return" to an "implant station" out in space. In the implant station, the thetan will have all memories from the most recent lifetime electronically erased, and then the thetan will be sent back to earth to "pick up a new body," or start another life.

But Scientology promises that with auditing, the person can erase this "return command" so that he will never again have to return to an implant station after death. He will then be

a "free being," able to drop his body and pick up a new body with full consciousness and self-determinism.

Scientists therefore believe that they are very ancient beings, with memories that reach millions of years into the past, and that they are inherently immortal, once the impediments to immortality - the engrams - have been erased.

Scientists believe that they can become gods.

2. L. RON HUBBARD AS LIAR

"You belong to your father, the devil, and you want to carry out your father's desire. He was a murderer from the beginning, not holding to the truth, for there is no truth in him. When he lies, he speaks his native language, for he is a liar and the father of lies."
John 8:44

To his followers, L. Ron Hubbard was larger than life. The biographies of Hubbard given within the cult portray the metamorphosis of this legendary man in stages from youthful prodigy, to teenage adventurer, to brave war hero, to the long-suffering messiah who gave his life for all.

Unfortunately, almost every fact in the cult biographies of L. Ron Hubbard is a lie. While the legendary accomplishments of this cult guru could have come unedited from one of his swashbuckling novels, the true facts of his life reveal quite another picture.

As with the Wizard of Oz, once the curtain was drawn, the fearsome wizard was just an ordinary man. So it was with Hubbard.

"L. Ron Hubbard," the official biography begins, "was born in Tilden, Nebraska, on the 13th of March, 1911. His father was Commander Harry Ross Hubbard of the United States Navy. His mother was Dora May Hubbard...." (1)

So far, everything is true.

The biography continues:

"Ron spent his early childhood years on his grandfather's large cattle ranch in Montana, said to cover a quarter of the state. It was on this ranch that he learned to read and write by the time he was three and a half years old." (2)

The truth is that Hubbard's grandfather was a small town veterinarian who did not own a cattle ranch in Montana. After Hubbard and his parents relocated to Helena, Montana, where his father was hired to manage a local theater, the grandparents soon followed, bought a house on Fifth Avenue, and the grandfather opened the Capital City Coal Company.

The story continues:

"L. Ron Hubbard found the life of a young rancher very enjoyable. Long days were spent riding, breaking broncos, hunting coyote and taking his first steps as an explorer. For it was in Montana that he had his first encounter with the Blackfoot Indians. He became a blood brother of the Blackfoot..." (3)

Although these events may have existed in the imagination of a young boy in Montana, that is the only place where they did, in fact, exist.

Young Ron Hubbard lived with his parents in a small apartment on Rodney Street in Helena, and he attended the local kindergarten.

When he was six years old, his father enlisted in the Navy after the start of World War I. For the next few years, Ron and his mother followed Harry to a series of port cities where Harry was stationed.

"By the time he was twelve years old, young Ron Hubbard had read a large number of the world's greatest classics - and his interest in philosophy and religion was born. Ron Hubbard had the distinction of being the only boy in the country to secure an Eagle Scout badge at the age of twelve years..." (4)

Although Hubbard did receive an Eagle Scout badge, the Boy Scouts of America keeps only an alphabetical listing of Eagle Scouts, with no record of their ages.

"The following years, from 1925 to 1929, saw the young Hubbard, between the ages of fourteen and eighteen, as a budding and enthusiastic world traveler and adventurer.... Having the financial support of his wealthy grandfather, L. Ron Hubbard spent these years journeying through Asia." (5)

"He was up and down the China coast several times in his teens from Ching Wong Tow to Hong Kong and inland to Peking and Manchuria.

"In China he met an old magician whose ancestors had served in the court of Kublai Khan. In the hills of Tibet he lived with bandits who accepted him because of his honest interest in them and their way of life.

"In the remote reaches of western Manchuria he made friends with the ruling warlords by demonstrating his horsemanship. Deep in the jungles of Polynesia he discovered an ancient burial ground steeped in the tradition of heroic warriors and kings..." (6)

Heady adventures for a teenager!

The truth, however, is a bit more believable. At the age of thirteen, the Hubbards had moved to Bremerton, Washington, where young Ron was an eighth grader at Union High School. Hubbard enjoyed such activities as hiking and camping at the nearby Boy Scout campground.

Two years later, when Ron was a sophomore at Queen Anne High School, his father was unexpectedly posted to Guam, where Ron spent part of the summer, sailing with his

mother on the steamship President Madison, with stops in Honolulu, Yokohama, Shanghai, Hong Kong and Manila.

In the spring of his junior year, Ron dropped out of school. Two years later, Ron was enrolled in the Woodward School for boys in Washington, D.C. as a substitute for taking the College Entrance Examination. In 1930, Ron was admitted to George Washington University School of Engineering with a major in civil engineering.

His grades for the first semester ranged from an A in Physical Education, a C in Mechanical Engineering, a D in chemistry, and F's in German and Calculus, earning him a D average. After a second and similar semester, he dropped out of school. Later he would say he had been a student in the first course in atomic physics in the country and that he had a Ph.D. - which he renounced much later when it became known that the degree had been purchased from a California diploma mill.

Soon Hubbard married and began his career as a struggling science fiction writer. His stories began to appear regularly in Astounding Science Fiction magazine.

In 1941, as the United States was drawn into the Second World War, Hubbard was determined to get into the Navy. He composed his own letter of recommendation for the military:

"I have known him for many years and have found him discreet, loyal, honest and without peer in the art of getting things done swiftly. "For courage and ability I cannot too strongly recommend him." (7)

Hubbard's stories of his naval career serve as an example of his most outrageous fiction writing:

"Commissioned by the U.S. Navy, Hubbard was ordered to the Philippines at the outbreak of the war and was flown home in the Secretary of the Navy's private plane as the first U.S. returned casualty of the Far East.

"He served in the South Pacific, and in 1942 was relieved and rushed home to take part in the battle against German submarines as Commanding Officer of a corvette serving in the north Atlantic.

"After serving in all five theaters of World War II and receiving twenty-one medals and palms, in 1944 he was severely wounded and was taken crippled and blinded to Oak Knoll Naval Hospital." (8)

The truth about Hubbard's war career is quite different.

Hubbard's first job in the Navy was a desk job in public relations. He soon requested a transfer to Navy Intelligence. On his way to this posting, he so antagonized his superior officers that he was sent home, with an entry in his record stating that:

"This officer is not satisfactory for independent duty assignment. He is garrulous and tries to give impressions of his importance. He also seems to think he has unusual ability in most lines. These characteristics indicate that he will require close supervision for satisfactory performance of any intelligence duty." (9)

The report also added that Hubbard had become "the source of much trouble."

Hubbard was then given another desk job. Eventually, however, he worked his way out of this job, and into the Submarine Chaser Training Center in Miami, Florida. After a few misadventures on training ships under his command, the following notation was placed in his record:

"Consider this officer lacking in the essential qualities of judgment, leadership and cooperation. He acts without forethought as to probable results. Not considered qualified for command or promotion at this time. Recommend duty on a large vessel where he can be properly supervised." (10)

Subsequently, Hubbard was posted onto the U.S.S. Algol. As the Algol prepared to go into battle, in a strange incident which occurred just before the Algol sailed to the Pacific, Hubbard discovered a homemade gasoline bomb in a coke bottle amidst the cargo being loaded onto the ship. There was an investigation into this curious incident, but the results of the investigation were not recorded. However, that evening, Hubbard was relieved of duty.

"Crippled and blinded at the end of the war, he resumed his studies of philosophy and by his discoveries recovered so fully that he was reclassified in 1949 for full combat duty. It is a matter of medical record that he has twice been pronounced dead and in 1950 he was given a perfect score on mental and physical fitness reports." (11)

Hubbard reported in sick with a suspected ulcer, and was hospitalized at Oak Knoll Military Hospital in Oakland, California, where he remained until December 5th, 1945, when he was discharged from the Navy.

Contrary to his own report of receiving twenty-one war medals, he received four routine medals which were awarded to all servicemen serving in this war.

He was eventually awarded a small partial disability rating.

Two years later, in a pathetic letter to the Veteran's Administration, Hubbard wrote:

"This is a request for treatment."

"After trying and failing for two years to regain my equilibrium in civil life, I am utterly unable to approach anything like my own competence. My last physician informed me that it might be very helpful if I were to be examined and perhaps treated psychiatrically..."

"I cannot account for nor rise above long periods of moroseness and suicidal inclinations... I cannot, myself, afford such treatment.

"Would you please help me?

Sincerely, L. Ron Hubbard" (12)

The Veteran's Administration apparently ignored this letter, to the great detriment of the thousands of souls caught up in Hubbard's later voyage into the world of the demonic in the dangerous cult of Scientology.

Had the Veteran's Administration heeded Hubbard's plea for help, the outcome for many might have been different.

The outcome of history is often ordained by the trivial and the mundane. So it was with Hubbard.

3. THE SATANIC ROOTS OF SCIENTOLOGY

"Have nothing to do with the fruitless deeds of darkness, but rather expose them."
Ephesians 5:11

It is a well documented fact that the religion of Hubbard was Satanism. Hubbard's mentor was, in fact, the infamous English black magician Aleister Crowley. Hubbard reportedly discovered Crowley's works as a teenager on a trip to the Library of Congress with his mother.

Thereafter, he was fascinated by Crowley's "Magick," and Crowley became Hubbard's mentor, a relationship that would last until Crowley's death in 1947. In one of his later lectures, Hubbard would refer to Crowley as "my good friend." (1)

Crowley's most famous work was called The Book of the Law in which he expressed his philosophy of life: "Do what thou wilt shall be the whole of the Law." It is a philosophy Hubbard was to live by throughout his life.

Crowley wrote, in The Book of the Law:

"We have nothing with the outcast and the unfit; let them die in their misery.
Compassion is the vice of Kings; stamp down the wretched and the weak; this is the law of the strong; this is our law and the joy of the world.
"I am of the snake that giveth Knowledge and Delight, and stir the hearts of men with drunkenness. To worship me take wine and strange drugs... They shall not harm ye at all. It is a lie, this folly against self... Be strong, Oh man! Lust, enjoy all things of sense and rapture... the kings of the earth shall be kings forever; the slaves shall serve.
"Them that seek to entrap thee, to overthrow thee, them attack without pity or quarter, and destroy them utterly.
"I am unique and conqueror. I am not of the slaves that perish. Be they damned and dead! Amen." (2)

Many of Crowley's beliefs have been incorporated into Scientology, especially in the secret upper levels of Scientology, called the "OT levels."

Following in Crowley's footsteps, Hubbard adopted some of the practices of the black magician, including the use of drugs and the use of affirmations.

According to Hubbard's son, his father regularly used illegal drugs including amphetamines, barbiturates and hallucinogens including cocaine, peyote and mescaline. (3)

Among the many affirmations that Hubbard was known to have used was the following:

"All men shall be my slaves! All women shall succumb to my charms! All mankind shall grovel at my feet and not know why!" (4)

After being discharged from the Navy in December of 1945, Hubbard did not head for home, where his wife and two small children were living in Bremerton, Washington. He instead headed directly for a house in Pasadena, California, where an eclectic assortment of people lived including one Jack Parsons, the leader of a satanic organization called the Ordo Templis Orientis. That was the U.S. name for the organization headed in England by Crowley.

Parsons wrote to Crowley about Hubbard:

"About three months ago I met Ron... a writer and explorer of whom I had known for some time. He is a gentleman; he has red hair, green eyes, is honest and intelligent, and we have become great friends. "Although Ron has no formal training in magick, he has an extraordinary amount of experience and understanding in the field. From some of his experiences I deduce that he is in direct touch with some higher intelligence, possibly his guardian angel. "Ron appears to have some sort of highly developed astral vision. He described his angel as a beautiful winged woman with red hair, whom he calls the Empress, and who has guided him through his life, and saved him many times.

"We are pooling our resources in a partnership which will act as a limited company to control our business ventures.

"I need a magical partner. I have many experiments in mind..." (5)

Hubbard and Parsons struck up an occult partnership, the result of which was a series of rituals they carried out with the objective of producing a "moonchild," an incarnation of "Babylon" in an unborn child. A woman in the house was chosen to be the mother of this satanic child.

"In order to obtain a woman prepared to bear this magical child, Parsons and Hubbard engaged in eleven days of rituals.

"All this seemed to achieve its desired result and, on January 18th, Parsons found the girl who was prepared to become the mother of Babalon, and to go through the required incantation rituals. During these rituals, which took place on the first three days of March 1946, Parsons was High Priest and had sexual intercourse with the girl, while Hubbard who was present acted as skryer, seer, or clairvoyant and described what was supposed to be happening on the astral plane." (6)

Parsons wrote to Crowley:

"I am under command of extreme secrecy. I have had the most devastating experience of my life between February second and March fourth. I believe it was the result of the ninth degree working with the girl... I have been in direct touch with

the One who is most Holy and Beautiful as mentioned in the Book of the Law. First instructions were received direct through Ron, the Seer. I have followed them to the letter. There was a desire for incarnation. I am to act as instructor guardian guide for nine months, then it will be loosed upon the world. That's all I can say for now..." (7)

Crowley remained unimpressed. He wrote to one of his associates:

"Apparently Parsons and Hubbard or somebody is producing a moonchild. I get fairly frantic when I contemplate the idiocy of these louts." (8)

Later, Hubbard was to reveal some of his occult beliefs to his son in a conversation documented by L. Ron Hubbard, Jr.:

"We were in Philadelphia. It was November 1952. 'Every night in the hotel, in preparation for the next day's lecture, he'd pace the floor, exhilarated by this or that passage from Aleister Crowley's writings.

"Just a month before, he had been in London, where he had finally been able to quench his thirst; to fill his cup with the true, raw, naked power of the magick. The lust of centuries at his very fingertips.

"To stroke and taste the environs of the Great Beast, to fondle Crowley's books, papers, and memorabilia had filled him with pure ecstasy!

"In London he had acquired, at last, the final keys; enabling him to take his place upon the 'Throne of the Beast,' to which he firmly believed himself to be the rightful heir.

"'The books and contents to be kept forever secret,' he says. To reveal them will cause you instant insanity; rip your mind apart; destroy you,' he says.

"'Secrets, techniques and powers I alone have conquered and harnessed. I alone have refined, improved on, applied my engineering principles to. Science and logic. The keys! My keys to the doorway of the Magick, my magick! The power!'

"'I've made the Magick really work,' he says. 'No more foolish rituals. I've stripped the Magick to basics - access without liability.'

"'Sex by will,' he says. 'Love by will - no caring and no sharing - no feelings. None,' he says. 'Love reversed,' he says. 'Love isn't sex. Love is no good; puts you at effect. Sex is the route to power,' he says. 'Scarlet women! They are the secret to the doorway. Use and consume. Feast. Drink the power through them. Waste and discard them.'

"'Scarlet?' I ask.

"'Yes Scarlet: the blood of their bodies, the blood of their souls,' he says.

"'Release your will from bondage. Bend their bodies; bend their minds; bend their wills; beat back the past. The present is all there is. No consequences and no guilt. Nothing is wrong in the present. The will is free - totally free; no feelings; no effort; pure thought - separated. The Will postulating the Will,' he says.

"'Will, Sex, Love, Blood, Door, Power, Will. Logical,' he says.

"'The doorway of Plenty. The Great Door of the Great Beast.' (9)

It is possible that Hubbard not only believed in Satan - he believed he was Satan!

"According to Ron (Hubbard) Jr., his father considered himself to be the one 'who came after'; that he was Crowley's successor; that he had taken on the mantle of the 'Great Beast.' He told him that Scientology actually began on December the 1st, 1947. This was the day Aleister Crowley died." (10)

This is the foundation of Scientology, the "Road to Total Freedom"!

4. SCIENTOLOGY AND CHRISTIANITY

"Jesus answered, 'Watch out that no one deceives you. For many will come in my name, claiming, 'I am the Christ,' and will deceive many.'"
Matthew 24:4-5

Hubbard's teachings about Christ are somewhat contradictory. In an earlier writing he states that Christ never existed but was only an idea electronically implanted in our minds during the "between lives" period (he called this implant "R6").

"Somebody on this planet, about 600 B.C. found some pieces of "R6."

"I don't know how they found it; either by watching madmen or something. But since that time they have used it. And it became what is known as Christianity.

"The man on the cross. There was no Christ!

"The Roman Catholic Church, through watching the dramatizations of people picked up some little fragments of R6." (1)

Then in a later writing he portrays Christ differently:

"For those of you whose Christian toes I may have stepped on, let me take the opportunity to disabuse you of some lovely myths. For instance, the historic Jesus was not nearly the sainted figure (he) has been made out to be. In addition to being a lover of young boys and men, he was given to uncontrollable bursts of temper and hatred... You have only to look at the history his teachings inspired to see where it all inevitably leads. It is historic fact and yet man still clings to the ideal, so deep and insidious is the biologic implanting." (2)

Similarly, Hubbard's overall tone when writing about Christianity in general is usually derogatory:

"The whole Christian movement is based on the victim... They won by appealing to victims. We can win by converting victims. Christianity succeeded by making people into victims. We can succeed by making victims into people." (3)

And:

"Very often you will find aberrative personalities addicted to religion, but the addiction will not be accompanied by any belief in the human spirit. Just how this paradox is accomplished - a professed avowal of Christianity and a complete unwillingness to accept any effort to heal or help the human spirit - is another one of the paradoxes which mark the aberrative personality." (4)

Hubbard, in fact, believed himself to be the reincarnation of Buddha, as expressed in his poem, *The Hymn of Asia*:

"Everywhere you are
I can be addressed
But in your temples best
Address me and you address
Lord Buddha
And you then address
Meitreya."

Hubbard writes that Christianity is simply an extension of Buddhism:

"And the parables of Gautama Buddha were re-expressed with some differences and additions to spread westward again as Christianity." (5)

And then Hubbard teaches that the goals set by Christ find their fulfillment in Scientology:

"This science (Scientology) is formed in the tradition of ten thousand years of religious philosophy and considers itself a culmination of the searches which began with the Veda, the Tao, Buddhism, Christianity and other religions... Scientology can demonstrate that it can attain the goals set for man by Christ, which are: Wisdom, Good Health, and Immortality." (6)

In a curious piece of writing, Hubbard states that he has been to "heaven" three times in his past lives. Heaven, according to Hubbard, is an implant; and in one course he draws the pattern of the implant in something called a Line Plot:

"Well, I have been to heaven.

"Yes, I've been to heaven. And so have you. And you have the pattern of its implants in the... Line Plots. It was complete with gates, angels and plaster saints and electronic implantation equipment. So there was a Heaven after all - which is why you are on this planet and were condemned never to be free again until Scientology.

"For a long while, some people have been cross with me for my lack of cooperation in believing in a Christian Heaven, God and Christ. I have never said I didn't believe in a Big Thetan but there was certainly something very corny about Heaven et al. Now I have to apologize. There was a Heaven. Not too unlike, in cruel betrayal, the heaven of the Assassins in the 12th Century who, like everyone else, dramatized the whole track implants....

"The symbol of the crucified Christ is very apt indeed. It's the symbol of the thetan betrayed." (7)

According to Hubbard's son, Hubbard considered himself to be Crowley's successor. When Crowley died in 1947, Hubbard believed that he had taken on the "mantle of the Great Beast," and that he was in fact the anti-Christ.

He makes this claim in a late writing:

"No doubt you are familiar with the Revelations (sic) section of the Bible where various events are predicted. Also mentioned is a brief period of time in which an arch-enemy of Christ, referred to as the anti-Christ, will reign and his opinions will have sway... this anti-Christ represents the forces of Lucifer (literally, the "light-bearer" or "light-bringer"), Lucifer being a mythical representation of the forces of enlightenment... My mission could be said to fulfill the Biblical promise represented by this brief anti-Christ period." (8)

In this same essay, he also predicts that after his death, he will return as the anti-Christ of the Bible. He also states that the so-called "Second Coming" of Christianity will actually be an invasion of earth by a race called the Marcabians from outside the universe. But Hubbard, as the anti-Christ, will return to save us:

"I will return not as a religious leader but a political one... I will not be known to most of you, my activities misunderstood by many, yet along with your constant effort... I will effectively postpone and then halt a series of events designed to make happy slaves of us all." (9)

When new people are inducted into Scientology they are often told that Scientology is non-denominational, and that there is no inherent conflict between Scientology and any religion, including Christianity. But it is common for Scientologists to be less than truthful to the public at the outset. By calming the new person's misgivings, they know that by the time the person has become fully indoctrinated into Scientology, these misgivings will no longer matter.

I hope that it is now clear that there is no compatibility between Scientology and Christianity; in fact, as a belief system based on satanic principles, Scientology is diametrically opposed to Christianity. The truth is that you cannot be both a Christian and a Scientologist.

The choice is up to you.

5. THE PROPAGANDA OF SCIENTOLOGY

"But there were also false prophets among the people, just as there will be false teachers among you. They will secretly introduce destructive heresies, even denying the sovereign Lord who bought them - bringing swift destruction on themselves."

2 Peter 2:1-2

From one's first day in Scientology, one is constantly bombarded by propaganda. In the hundreds of tape recorded messages of Hubbard and the thousands of printed pages studied daily, one's world view is constantly being shaped according to the paranoid world view of the cult leader. This world view has nothing to do with Christianity.

In all of the propaganda of Scientology, three lessons predominate:

1. That there is a problem.
2. That there is a solution to the problem.
3. That the solution can only be found in Scientology.

The first problem posed by Hubbard is the imminent danger of nuclear war. And only Scientology has the potential to thwart this danger:

"We are the only people and the only organizations on Earth which have the technology and the ambition to attempt a clarification of situations which in other hands are considered entirely out of control, to wit, the atomic bomb and the decay and confusion of central governments." (1)

And:

"In the same period in history, two of the most sweeping forces Man has known have come to fruition: a knowledge of himself and others with Scientology, and a means of destroying himself and all others by atomic fission. Which force wins depends in a large measure on your use of Scientology." (2)

And:

"The mission of Scientology is not conquest - it is civilization. It is a war upon stupidity, the stupidity of which leads us to the Last War of All." (3)

And:

"The primary race of Earth is not between one nation and another today. The only race that matters at this moment is the one being run between Scientology and the

atomic bomb. The history of man, as has been said by well-known authorities, may well depend upon which one wins." (4)

The second problem posed by Hubbard is that mankind is caught in a trap, and that he has been in this trap for millions of years during which he has been recycling back to earth through an endless series of lifetimes. It is only through Scientology auditing that he can escape this trap:

"In fifty thousand years of history on this planet alone, Man never evolved a workable system. It is doubtful if, in foreseeable history, he will ever evolve another. Man is caught in a huge and complex labyrinth. To get out of it requires that he follow the closely taped path of Scientology." (5)

And:

"We're free men and women - probably the last free men and women on Earth.... If we don't do a good job now we may never get another chance." (6)

And:

"Is there a way out?

"Yes there is.

"We have it in Scientology now. I have found it and charted it. I know exactly how to open the gate." (7)

And:

"The whole agonized future of this planet, every Man, Woman and Child on it, and your own destiny for the next endless trillions of years depends on what you do here and now with and in Scientology." (8)

The Scientologist is trained to believe that the only hope for the salvation of mankind is the "science" of Scientology. That there is no other hope.

"In all the broad universe there is no other hope for man than ourselves." (9)

And:

"Let us face the reality of this thing. The world confronts several crises. Man's inhumanity to Man is gaining monuments daily. The time to bring a chaos under control is before it is well begun. We're slightly late as it is. Brutally, there is no other organization on Earth that can slow these down. Factually there is no other know-how on Earth that can plumb the problems of Man. So if we don't want all of us to be sitting amongst the charred embers, we had better get busy." (10)

And:

"We are the first group on earth that knew what they were talking about. All right, sail in. The world's ours. Own it." (11)

And:

"Auditors have since the first session of Scientology been the only individuals on this planet in this universe capable of freeing Man. (12)

Scientology is presented to believers in global terms as "The Road to Total Freedom" and as "The Only Hope for Mankind." The goal of every Scientologist is nothing less than to "Clear the planet," to ensure the salvation of every person on earth through the attainment of the Scientology state of "Clear."

"We're playing for blood, the stake is Earth." (13)

And:

"The purpose of the Field Staff Member (a Scientologist) is: To help LRH (Hubbard) contact, handle, salvage and bring understanding to individuals and thus the peoples of Earth." (14)

And:

"Now, without further discourse, let's get hot. This is Scientology - the freedom for Man. Let it be known." (15)

And:

"Scientology - The Road Sign Out.

"We are the Free People. We LIVE! We're FREE!" (16)

And:

"There is no greater game in the Universe than Scientology, for it is the only game in which everybody wins." (17)

And:

"The Valuable Final Products of a Scientologist are:
DISSEMINATED KNOWLEDGE
PURCHASED BOOKS
ENVIRONMENTAL CONTROL
A CLEARED PLANET" (18)

And:

"The eons march on... Perhaps, this time, due to our efforts, a humanitarian world can exist. We, the Prophets of the Morrow, know the way." (19)

Scientology wants you - your mind, your spirit, your soul.

"No one can serve two masters." Matthew 6:24

Jesus Christ or L. Ron Hubbard - who will your master be?

6. CREATION ACCORDING TO SCIENTOLOGY:

THE FACTORS, by L. Ron Hubbard

1. Before the beginning was a Cause and the entire purpose of the Cause was the creation of effect.
 2. In the beginning and forever is the decision and the decision is TO BE.
 3. The first action of beingness is to assume a viewpoint.
 4. The second action of beingness is to extend from the viewpoint, points to view, which are dimension points.
 5. Thus there is space created, for the definition of space is: viewpoint of dimension. And the purpose of a dimension point is space and a point of view.
 6. The action of a dimension point is reaching and withdrawing.
 7. And from the viewpoint to the dimension points there are connection and interchange. Thus new dimension points are made. Thus there is communication.
 8. And thus there is light.
 9. And thus there is energy.
 10. And thus there is life...."
- (There are thirty Factors in all)

Humbly tendered as a gift to man by
L. Ron Hubbard
April 23, 1953

7. THE CREED OF SCIENTOLOGY

"We of the Church believe:

That all men of whatever race, color or creed were created with equal rights.

That all men have inalienable rights to their own religious practices and their performance.

That all men have inalienable rights to their own lives.

That all men have inalienable rights to their own sanity.

That all men have inalienable rights to their own defense.

That all men have inalienable rights to conceive, choose, assist and support their own organizations, churches and governments.

That all men have inalienable rights to think freely, to talk freely, to write freely their own opinions and to counter or utter or write upon the opinions of others.

That all men have inalienable rights to the creation of their own kind.

That the souls of men have the rights of men.

That the study of the mind and the healing of mentally caused ills should not be alienated from religion or condoned in nonreligious fields.

And that no agency less than God has the power to suspend or set aside these rights, overtly or covertly.

And we of the Church believe:

That man is basically good.

That he is seeking to survive.

That his survival depends upon himself and upon his fellows, and his attainment of brotherhood with the Universe."

Etc.

8. SCIENTOLOGY EVALUATED IN THE LIGHT OF BIBLICAL CHRISTIANITY

from Those Curious New Cults by William J. Petersen

"How, then, can Scientology be evaluated by biblical Christianity?"

First, its primary assumption that man is basically good is not biblical. Familiar scriptures such as "For all have sinned and come short of the glory of God," and "All our righteousnesses are as filthy rags," indicate quite clearly that the Bible and Hubbard are not in the same corner.

Second, Scientology's highest authority is not Jesus Christ or the Christian Bible but a science fiction writer named L. Ron Hubbard. In some ways, the Scientology organization is disturbingly similar to Orwell's 1984 with Ron Hubbard as "Big Brother."

Third, to Scientology God is irrelevant. Scientology alone is relevant. Whether God exists or not is not a matter of concern.

Fourth, Scientology has no salvation to offer the poor. Books are sold, counseling sessions are expensive. Nothing is said about the plight of the poor, the sick, the homeless and oppressed. According to Time magazine, one woman said, "It's the only church I've seen with a cashier's booth." Contrast that to biblical Christianity which offers salvation without money and without price.

Fifth, Scientology has a warped code of ethics. In the Scientology code are such statements as "Never fear to hurt another in a just cause," and "To punish to the fullest extent of my power anyone misusing or degrading Scientology to harmful ends." Such statements bear no resemblance to the words of Jesus: "Turn the other cheek," and "Love your enemies, bless them that curse you, do good to them that hate you and pray for them that spitefully use you and persecute you."

And sixth, Scientology deifies man. In fact, in their writings, man is often capitalized. Man's reason will produce perfect behavior and therefore solve all the problems of the human predicament."

9. A SUMMARY OF THE MAIN DIFFERENCES BETWEEN SCIENTOLOGY AND CHRISTIANITY

from The Challenge of the Cults by Maurice Burrell

Scientology

Christianity

1. AUTHORITY

Although the Bible is used to bolster up the sect's ideas, the source of Scientology's philosophy and technology is Hubbard himself.

As the Word of God, the Bible is the yardstick against which all claims (including those of Hubbard) have to be measured.

2. GOD

Although Hubbard and many of his followers are theists, belief in God is not essential to Scientology.

God is Trinity, Father, Son and Holy Spirit, three Persons within the unity of the Godhead.

3. CHRIST

Christ has no essential or central place in the sect's teachings.

"God sent his Son to be the Savior of the world."

4. SALVATION

Man is basically good, but "engrams" (psychological hang-ups) prevent him from reaching his full potential. When released from these engrams through the sect's techniques, man begins to live on a higher level in terms of his own human achievement.

Man needs to be saved from sin and to be given new life. Both are available from God through faith in Christ.

10. NOTES

(all underlined entries are by L. Ron Hubbard)

TWO:

1. Corydon, p. 219
2. Ibid, p. 219
3. Ibid, p. 219
4. Ibid, p. 220
5. Ibid, p. 220
6. Miller, p. 26
7. Ibid, p. 93
8. Ibid, p. 95
9. Ibid, p. 98
10. Ibid, p. 107
11. Facts About L. Ron Hubbard
12. 1947 Letter to the VA

THREE:

1. Miller, p. 135
2. Corydon, p. 49
3. Ibid, p. 53
4. Ibid, p. 53
5. Ibid, p. 255
6. Ibid, p. 256
7. Ibid, p. 257
8. Ibid, p. 257
9. Ibid, p. 307
10. Ibid, p. 50

FOUR:

1. Routine R6EW
2. Student Briefing, OT VIII, Series 1
3. Technically Speaking
4. From PABS, Book 1
5. From PABS, Book 3
6. From PABS, Book 1
7. Routine 3 Heaven
8. Student Briefing, OT VIII, Series 1

FIVE:

1. Purpose
2. Fundamentals of Thought
3. Ibid
4. Ibid
5. Safeguarding Technology
6. Your Post
7. Escape
8. Keeping Scientology Working
9. Ron's Journal 1967
10. The Eighteenth A.C.C.
11. The World is Ours
12. Auditors
13. Policy Letter 7 Nov 1962
14. Field Auditors
15. The Public Divisions
16. We Are the Free People
17. Contests and Prizes
18. Org Board Division Six
19. Scientology: The Philosophy of a New Age

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

MARGERY WAKEFIELD,

Plaintiff,

VS.

THE CHURCH OF SCIENTOLOGY
OF CALIFORNIA, etc.,

Defendant.

Case No. 82-1313-Civ-T-10

IN CAMERA

MOTION FOR ORDER TO SHOW CAUSE WHY
PLAINTIFF SHOULD NOT BE HELD IN CRIMINAL CONTEMPT

The Church of Scientology of California ("Church"), Defendant above and Movant herein, moves the Court for an Order requiring Plaintiff, Margery Wakefield, to Show Cause why she should not be held in criminal contempt for the violation of the terms of the preliminary and permanent injunction entered by this Court on May 16, 1989. The basis for this motion, as more particularly set forth herein and the attached exhibits and in the accompanying Memorandum of Law, is that Wakefield recently appeared on a television program which was broadcast on November 18, 1992, during which Wakefield made statements which she knew to violate this Court's permanent injunction. In support of this motion the Church alleges:

1. Margery Wakefield and the Church entered into a Settlement Agreement in the above-styled case which was approved by this Court and filed under seal with the Court on August 14, 1986.

EXHIBIT

2

2. Paragraph 5 of the Settlement Agreement provided that the parties promised and agreed for valuable consideration to comply with every term, condition and undertaking contained in the transcript of the in Samara proceedings of July 11, 1986, a copy of which was attached to the Settlement Agreement as Exhibit

3. The parties further agreed that the Settlement Agreement would be enforceable by this Court.

3. The Church has fully complied with all the terms and conditions of the Settlement Agreement.

4. On July 2, 1987 the Church filed a Motion to Enforce Settlement Agreement and to Enjoin Plaintiff from violating the terms of the Settlement Agreement.

5. On May 16, 1989, the Court entered a Preliminary and Permanent Injunction against Margery Wakefield which provided in relevant part as follows:

That Margery Wakefield is restrained and enjoined from disclosing to other persons, not members of her immediate family, matters relating to: a) the substance of her complaint against the Church; b) the substance of her claim against the Church; c) alleged wrongs committed by the church; d) the contents of the documents which were returned to the Church pursuant to the settlement agreement or similar fact evidence.

6. On July 18, 1989 the Church filed motions to hold Wakefield in civil and/or criminal contempt for repeated violations of this Court's May 16 injunction, as a result of published interviews Wakefield granted to various newspapers and radio and television stations. This Court referred the matter to

Magistrate Paul Game, Jr. for a hearing which was held in October and November, 1989.

7. In a Report and Recommendation dated June 25, 1990, Magistrate Game concluded that Wakefield had engaged in a total of forty-four separate willful violations of this Court's injunction which would warrant findings of civil contempt. Additionally, Magistrate Game deferred to this Court's discretion whether a referral should be made to the United States Attorney's office for prosecution of Wakefield on criminal contempt charges. Magistrate Game's June 25, 1990 Report and Recommendation is pending before this Court.

8. On November 18, 1992 a television program entitled "Au Nom De La Loi" (In the Name of the Law) was broadcast in Belgium by television station RTBF (the "RTBF Program"). The RTBF Program contained several segments in which Margery Wakefield, who was identified each time by name, spoke on camera in English with a French "voice-over" about her experiences in the Church of Scientology and her views of Scientology. The televised segments involving Wakefield were apparently filmed in the Clearwater, Florida area. In the course of the RTBF program Wakefield made statements which are willful and knowing violations of this Court's May 16, 1989 injunction. Some of the aforementioned statements made by Wakefield on the RTBF Program are identical in substance to statements previously determined by Magistrate Game in his June 25, 1990 Report to have been willful contempts of this Court's injunction by Wakefield in 1989. The

details of Wakefield's recent new violations are set out more fully in the Declaration of Michael Lee Hertzberg, Esq., attached hereto as Exhibit A and are evidenced by excerpts from a certified translation of the RTBF Program attached hereto as Exhibit B.

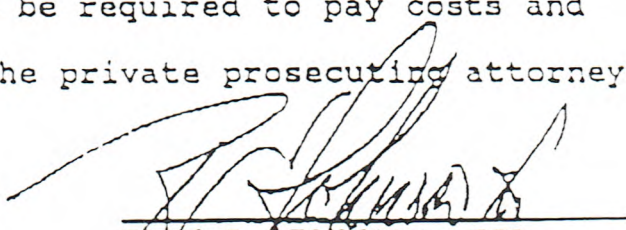
WHEREFORE, the Church respectfully moves as follows:

1. The Court appoint the United States Attorney or a private attorney to prosecute Wakefield's criminal contempt.

2. That the Court issue an Order requiring Plaintiff, Margery Wakefield, to appear before this Court and show cause why Wakefield should not be adjudged in criminal contempt of this Honorable Court and have sanctions imposed upon her as provided by law including but not limited to a fine of up to \$500.00 or imprisonment not exceeding six (6) months for each act of contempt.

3. That Wakefield be required to pay costs and attorneys' fees incurred by the private prosecuting attorney.

Dated: February 12, 1993



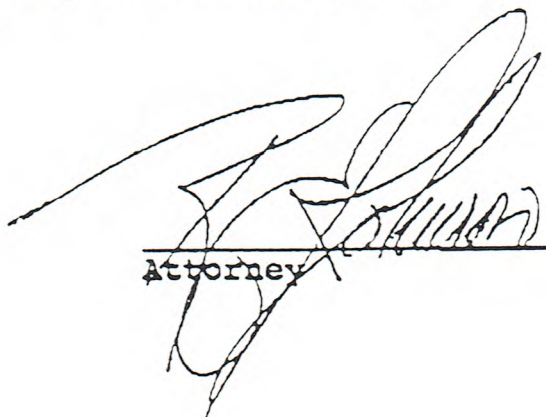
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Attorneys for Defendant-Movant
THE CHURCH OF SCIENTOLOGY
OF CALIFORNIA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy hereof has been furnished to
MARGERY WAKEFIELD, P.O. Box 290402, Tampa, Florida 33687
by U.S. mail this 12 day of February, 1993.



Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

MARGERY WAKEFIELD,)	
)	Case No. 82-1313-Civ-T-10
Plaintiff,)	
)	<u>IN CAMERA</u>
vs.)	<u>DECLARATION OF</u>
)	<u>MICHAEL LEE HERTZBERG, ESQ.</u>
THE CHURCH OF SCIENTOLOGY)	
OF CALIFORNIA, etc.,)	
)	
Defendant.)	
<hr/>		

MICHAEL LEE HERTZBERG hereby declares and states:

1. I am an attorney who has previously appeared before this Court on behalf of the defendant Church of Scientology of California ("the Church") in this matter. My co-counsel is Paul B. Johnson of the firm of Johnson and Johnson in Tampa. I submit this Declaration in support of the Church's Motion for Order to Show Cause Why Plaintiff Should Not Be Held In Criminal Contempt. I have personal knowledge of the facts set forth in this Declaration and could competently testify thereto if called as a witness.

2. On or about November 18, 1992 a television program entitled "Au Nom De La Loi" ("In the Name of the Law") was broadcast in Belgium by station RTBF (the "RTBF Program"). The narration and most of the interviews on the RTBF Program are conducted in French. Some of the interviews are in English with a voice over narration in French.

3. The RTBF Program includes several segments in which Margery Wakefield speaks on camera and is identified by name.

Counsel representing the Church herein viewed a videotaped copy of the RTBF Program and concluded that remarks were made by Wakefield during the Program which violated an injunction entered by this Court against Wakefield dated May 16, 1989.

4. Counsel hired a translator, Annette T. Gordon, to translate the RTBF Program from French to English and to prepare a transcript of her translation. Ms. Gordon, who has no relationship to the Church, has experience providing transcriptions from French to English for the United States Customs Service and has also translated from French to English in proceedings in the United States District Court for the Middle District of Florida. Attached as Exhibit B herein are eleven pages containing the portions of the transcript prepared by Ms. Gordon in which Margery Wakefield either speaks or is referred to, together with an affidavit from Ms. Gordon certifying the accuracy of her translation and reciting her professional qualifications. Should this Court desire, the Church will file the forty-one page translation of the entire RTBF Program as well as a copy of the videotape of the Program. The Church has not done so at this time to avoid burdening the Court with excess material.

5. Significant portions of the RTBF Program were filmed in or about Clearwater, Florida, and Clearwater appears to be the venue for the segments involving Wakefield.

6. Wakefield is introduced on the RTBF Program as a former Scientologist qualified to describe what the Church of Scientology is like based upon her personal experience.

7. The narrator of the RTBF Program reports that Wakefield has disclosed that she was transformed by the Church into a "zombie" by techniques of "brainwashing":

VOICE: For 12 years MARGERY was a convinced Scientologist. And, now she's revealed to us how the sect transformed her into a zombie, an obedient and docile robot. The method is simple and frightening at the same time. A daily drill exacerbated by the techniques of brainwashing.

8. During the RTBF Program Wakefield claimed that the Church's training routines are designed as hypnotic processes:

MARGERY:

★ ★ ★

T-R-O-, the first drill that we did is part of the first Scientology course, which is called "Communication Course." They tell you that this drill serves in helping you better your visual contacts, but, really, is designed to hypnotise. When I was in Scientology, this drill lasted 2 hours.

9. During the RTBF Program Wakefield stated that at the time she worked at the Church's Guardian Office she was aware of the planning of two murders:

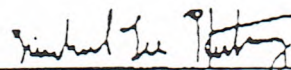
MARGERY:

★ ★ ★

Michael Meisner was one of the two people that we had planned to murder in 1979. I think it was. And, the day that I was told that, we had the meeting in the Guardian Office, Michael Meisner was handcuffed to a bed. The Guardian Office had him somewhere

in hiding. The plan was to take him, the next day, out to sea, out to the bay, tie weights on him and to throw him overboard. In Scientology, it's called "Deep Sixing." That was the plan.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on February 11, 1993 at New York, New York.



MICHAEL LEE HERTZBERG

1
2 Gerald Armstrong
3 715 Sir Francis Drake Boulevard
4 San Anselmo, CA 94960
5 (415)456-8450

6 In Propria Persona

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA

8 FOR THE COUNTY OF MARIN

9 CHURCH OF SCIENTOLOGY INTERNATIONAL,)
10 a California not-for-profit)
11 religious corporation,)

12 Plaintiff,

13 vs.

14 GERALD ARMSTRONG; MICHAEL WALTON;
15 THE GERALD ARMSTRONG CORPORATION)
16 a California for-profit)
17 corporation; DOES 1 through 100,)
18 inclusive,)

19 Defendants.

No. 157 680

DECLARATION OF
KEITH SCOTT
IN OPPOSITION TO
MOTIONS FOR SUMMARY
ADJUDICATION OF 20TH
CAUSE OF ACTION; AND
13TH, 16TH, 17TH &
19TH CAUSES OF ACTION
OF SECOND AMENDED
COMPLAINT

Date: 4/21/95
Time: 9:00 a.m.
Dept: One
Trial: 5/18/95

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DECLARATION OF KEITH SCOTT

I, Keith Scott, declare:

1. I am over the age of 18 years. I am a resident of the State of California and I have personal knowledge of the matters set forth herein. If called upon as a witness herein I could testify competently thereto.

2. I was an active member of the Church of Scientology from February, 1974 to 1979. I studied its "technical" and "management" policies and I became familiar with its organization structure and many of its practices.

3. I am now a Christian. Along with my wife Shawn I have Christian ministry we call the Cults Awareness Ministry. A vital aspect of my ministry to offer advice born of experience people who are going in or thinking about coming out of Scientology. I do this work from a Christian perspective, using the strength and truths I have gained through my faith in Jesus Christ as my Lord and Savior. I expose the untruths of Scientology and explain the dangers to the spiritual well-being and future of people who follow those untruths rather than the truths of the Word of God.

4. I have known Gerry Armstrong for about two years and have communicated with him a few times during this period. I am familiar with the part he played in bringing many of the untruths of Scientology and its founder L. Ron Hubbard to light. I use the information he made public, where applicable, in advising people who are led to me as a result of their doubts about Scientology. I am familiar with the attacks on him by Scientology to impugn his credibility so his information would

1 not be believed. I am familiar with Scientology's attacks on any
2 critic; and this is one aspect of Scientology which is dangerous
3 and which I expose in my ministry.

4
5 5. When I first got involved in Scientology, I was a
6 Christian, but a lapsed one. At that time I believed
7 Scientology's public statements that it accepted Christians, had
8 no essential disagreement with the Christian Faith, and that
9 someone could practice both Christianity and Scientology. The
10 farther I went in Scientology, the clearer it became to me that
11 Scientology in its actual practices and policies was anti-
12 Christian. I understood that if I put my faith in God, or if I
13 proclaimed Christ as my personal savior, I would have been
14 considered "PTS Type III," or psychotic.

15 6. I believe I was saved from the manipulation and mind
16 control of Scientology by the Grace of God recognized through my
17 faith in His Son, Jesus Christ.

18 7. Only recently did I see the two bulletins appended
19 hereto as Exhibits A and B respectively, "Routine 3 Heaven,"
20 dated May 11, 1963, and "Resistive Cases Former Therapy," dated
21 September 23, 1968. In these bulletins Hubbard asserts that
22 Christ, God and Heaven are implants, designed for the enslavement
23 of man, and that only Scientology can save man from this
24 "religious" slavery. I believe this is a blasphemy of the Holy
25 Spirit, and that people led along Scientology's "road to total
26 freedom" to believe these lies and themselves blaspheme the Holy
27 Spirit, are in danger of eternal damnation.

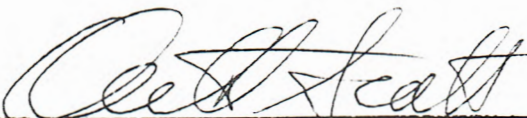
28 8. Scientology claims to be a religion, and calls its

1 practices religious expression, and its management policies and
2 technical bulletins and all other writings about Scientology
3 "scriptures." That may be, for our country permits even the most
4 antisocial organizations to call themselves "religions," and
5 receive all the benefits of the First Amendment. It is entirely
6 inconsistent, however, that our country, through our courts, can
7 stop anyone from his religious expression, speaking out against
8 the dangers of such antisocial organizations.
9

10 9. To my wife's and my knowledge, harassment of us from
11 Scientology individuals has been minimal. We say "to our
12 knowledge," because we are so aware of the operations done
13 covertly against critics of Scientology. We feel concern that
14 this will change and that we will become targets because of our
15 friendship with Gerry. Even so, we feel compelled to offer our
16 help.

17 I declare under the penalty of perjury under the laws of
18 California that the foregoing is true and correct.

19 Executed in ARCATA, CA, California, this 5th
20 day of April, 1995.

21 
22 Keith Scott

HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex.

Central Orgs.
Franchise

HCO BULLETIN OF MAY 11, AD13

ROUTINE 3
HEAVEN

Well, I have been to Heaven.

And I've found that Scientologists have been to Heaven.

And that everybody has evidently been to Heaven.

The Goals Problem Mass implants, which are the apparent basic source of aberration and human travail, which begin with the goal To Forget, were cynically done "in Heaven".

For a long while, some people have been cross with me for my lack of co-operation in believing in a Christian Heaven, God and Christ. I have never said I didn't disbelieve in a Big Thetan but there was certainly something very corny about Heaven et al. Now I have to apologize. There was a Heaven. Not too unlike, in cruel betrayal, the heaven of the Assassins in the 12th Century who, like everyone else, dramatized the whole track implants - if a bit more so.

Yes, I've been to Heaven. And so have you. And you have the pattern of its implants in the HCO Bulletin Line Plots. It was complete with gates, angels and plaster saints - and electronic implantation equipment. So there was a Heaven after all - which is why you are on this planet and were condemned never to be free again - until Scientology.

Before you went to Heaven you were not really very bad or very good, but you didn't think you had lived only once and you had a good memory and knew who you were and enjoyed life. Afterwards ---

The symbol of the crucified Christ is very apt indeed. It's the symbol of a thetan betrayed.

DATA

Additional work and possible corrections need to be done but this is the gist of the matter:

The implants are electronic in nature and follow the pattern of the G.P.M.

The implant station existed on the order of magnitude of 43,000,000,000,000 years ago. (The dates may be part of the implants but do not appear so at this time. However, a possibility of correction of dates is reserved).

Some have been through it once, some more than once.

The first time I arrived and the moment of the implant To Forget was dated at 43,891,832,611,177 years, 344 days, 10 hours, 20 minutes and 40 seconds from 10:02½ PM Daylight Greenwich Time May 9, 1963. The second series was dated to the moment of the implant To Forget as 42,681,459,477,315 years, 132 days, 18 hours, 20 minutes and 15 seconds from 11:02½ PM Daylight Greenwich Time May 9, 1963.

There are no earlier such implants. There are no later such implants.

I evidently have a goal of my own at 305 Trillion (U.S.) years and an actual GPM, all of which pulled into this 43 Trillion year implant.

ADDITIONAL E-METER DATA

Five goals in all may be common to both sequences. The first 3 of the 5 are the same. There are no implants as to time according to the meter. There are no numbers in any implants, but dates rocket read. Implanting was done on a non-visible thetan, but arrival was in a ship in a doll body according to the meter. Star of Bethlehem, Pearly Gates, The Way out of the Universe, all of which RR on the meter, give a clue to recruitment actions.

There was no purpose in giving a particular thetan a particular goal. Planning had no individualization.

A preclear's overts should be scouted as to why these implants keyed in, Fac 1, hypnotism, etc. But doubtful if any preclear did this type of implanting.

The mood is set that thetans are evil, treacherous and bad but this is all part of the implant, not factual.

The earliest point of the series is not known at this writing but possibly contains a recruitment through advertising. The departure method from the series is not fully known yet but probably just abandonment.

Contd...

The implants were not done in a box or in some trick manner of projection. The scenery is actually there, common Mest Universe space and matter and in the Mest Universe.

The first (43 Trillion) series consists of 29 implanted goals.

The second (42 Trillion) series consists of 21 implanted goals.

The first three goals in both series are the same, To Forget, To Remember and To Go Away. The last goal and one other in both series are the same. The remaining goals are not the same for the two implants.

PERSONALLY PERCEIVED DATA.

The pattern of RIs is different for the two series, consisting in the second series of added RIs below the To Have a Goal-ivity and with a different dwindling of adjectives and adverbs, but are otherwise similar.

Both series have the Gates of Heaven visible. The last implant of both consists of "entering" Heaven. The last goal of both is To Be In Heaven.

The gates of the first series are well done, well built. An avenue of statues of saints leads up to them. The gate pillars are surmounted by marble angels. The entering grounds are very well kept, laid out like Bush Gardens in Pasadena, so often seen in the movies. Aside from the implant boxes which lie across from each other on the walk there are other noises and sounds as though the saints are defending and berating. These are unimportant to the incident.

The second series, probably in the same place, shows what a trillion years of overt acts does (or is an additional trickery to collapse one's time). The place is shabby. The vegetation is gone. The pillars are scruffy. The saints have vanished. So have the Angels. A sign on one (the left as you "enter") says "This is Heaven". The right has a sign "Hell" with an arrow and inside the grounds one can see the excavations like archaeological diggings with raw terraces, that lead to "Hell". Plain wire fencing encloses the place. There is a sentry box beside and outside the right pillar. The road "leading up" to the gates is deeply eroded. An effigy of Joseph, complete with desert clothing, is seen approaching the gates (but not moving) leading a donkey which "carries" the original Madonna and child from "Bethlehem". The implanting boxes lie on either side of this "entering" path at path level.

These are the actual ends of the two series. One backs out the gates, of course, from top oppterm down, as this is the end. The last two RIs after this last goal say "it is the beginning", "Not the end".

The place, by implant and inference, was supposed to be in the sky like a floating island. Actually it was simply a high place in the mountains of a planet and the gates pathway falls away into a gorge, very eroded and bare by the time of the second implant, but heavily forested and rolling at the time of the first.

The beginnings have not at this writing been so well explored by myself. I have not viewed the second beginning (which says it is the end). However I do know that the second series was done in long square tunnels with the implant boxes, not unlike small P.A. speakers with fretwork fronts, on either side.

The first series actually begins with arrival in a "town" (as everything is backwards to upset the time sense). This "town" consisted of a trolley bus, some building fronts, sidewalks, train tracks, a boarding house, a bistro in a basement where there is a "bulletin board" well lighted, and a BANK BUILDING.

The bank is the key point of interest. It is interesting that we use the word "bank" (taken actually from computerology) to indicate the reactive mind.

This bank building was the on-the-corner old-fashioned granite-like construction, two or three stories high, with the door in the rounded front - even a revolving type door. Inside to the left of the entrance door is a rounded counter. Directly across the room are THE stairs.

The top oppterm and terminal of To Forget are at the top of these stairs. The implant then proceeds on down the stairs, step by step, terminals on one side (the left if one were coming up the stairs) the oppterm on the other. The first series (43 Trillion) has all its implant impulses at step level. In the second series the boxes are ear high to a man. By the time the gates are arrived at in the first series, the terminals are on the left as you approach the gates, the oppterm on the right, having been reversed at some point.

Contd...

The first (43 Trillion) series had very fine marble stairs. The same stairs can be seen in any big well kept railway station. They were complete with a white ball held in a wrought iron stand.

The thetan was taken along apparently on a pole trap to which he was stuck. It does not proceed step by step throughout the whole of the implant series, but after the first flight of stairs, goes a ways, stops while several pairs of RIs fire then goes to a new location.

The place seemed to have people in it. But they are all effigies. These seem radioactive. Contact with them hurts. No living beings are seen. But effigies that look like humans are performing sudden, repetitive actions with long halts between. In the "basement" such dummies are seen operating machinery.

The boarding house at the actual beginning has a dummy guest and a landlady in kimono and wrappers, reading a newspaper.

There are no devils or satans that I saw.

There is a passenger getting on the trolley bus, a "workman" halfway down the first stairs of "To Forget" eating lunch" and in To Be in Heaven a gardener or electrician adjusting an implant box behind a hedge and periodically leaping up and screaming.

The place, so long as the implants remain only partially discharged, seems to swim in white and black electronic masses, but these dissipate as the implants are run out by pattern.

One actually "enters" the "town" as the first action. The implants, however, were rigged to make the gates seem the entrance to the incident. One backs through from the town, into the bank, down the steps and eventually out the Pearly Gates, down the hillside and is there let off and abandoned. One might have had a body or its remains at the town but has none when abandoned.

"TO BE IN HEAVEN" is the last goal implanted in both series. The goal may be slightly differently worded in the second series.

This is not a body building implant, though running it gives somatics to chest.

This is not a GE implant. It is the person's own. Running it, particularly badly, brings it down on the body. There are body somatics on it, however, particularly eyes, face, chest, bones.

It apparently only can be run by 3M listing and Rocket Reads. One must have the goal to get the RIs.

CONCLUSIONS.

The place is so full of lies by implant that the preclear becomes quite confused and this review of the actual data is necessary to a successful navigation. However, it is very easy to read more treachery into it than there is in it - which is enough.

However, as the place existed so long it was in a varying state of repair and some change. (This data on time is subject to review). But in 1.2 Trillion years only some of the implant pattern and mock up had shifted. However, there may have been other stations. Only time and research will really tell that.

One must date the preclear's first (earliest) goal to forget, find how many times the preclear went through it, or some such implant station, date the other times and be careful to run only the first of the first series. As this is basic, as in Prepchecking, Sec Checking and old engram running, it tends to ease up the remainder of the implants. But running the implants later than basic is very much harder on the pc even though it can be done. Wherever one misses an RI in an early implant, that repeated RI when found in a later one tends to be very much more heavily charged.

Re-running any implant that has only been partially run tends to rough up the whole implant and make it hard to run.

LUCK

I think we are lucky. It could have been much worse. This Heavenly dream of destruction could have been current, not so long ago. It could have happened often, not just once or twice or three times per pc. But apparently it didn't and is unique in itself.

This is the core of the Reactive Mind. It is all the way South. For here, just once on the whole track, somebody discovered the mechanism of purposes and RIs

Contd....

and utilized them to install religious mania and pin thetans down to "one life" and planets.

The thing was done so well that it has hung up ever since. There are other implants, there are other goals and GPMs, but these are minor and easily found and listed once this key implant series is out of the way.

We were in a position of having an infinite number of pieces to the puzzle. Now we have a finite number which even though very tough are still finite in number. Further, every processing step taken, every RI discharged is a positive gain toward a definite finite result in processing.

Further, we have our hands on an appalling bit of technology where the world is concerned. With rapidity and a Meter it can be shown that Heaven is a false dream and that the old religion was based on a very painful lie, a cynical betrayal.

What does this do to any religious nature of Scientology? It strengthens it. New religions always overthrow the false gods of the old, they do something to better man. We can improve man. We can show the old gods false. And we can open up the universe as a happier place in which a spirit may dwell. What more can you expect? This actually places us far beyond any other beings that are about. It puts us, through increased beingness and a restoration of life, in control of much destiny.

We have now only a few unsolved problems about life, huge though they may be, such as the construction of bodies and how does one establish the character of and communicate, if feasible, with beings who are making trees and insects. There are a few things like these. But I imagine when we finally manage to communicate with beetles under rocks and free them, we'll no doubt find the Creator of Heaven who 43 + Trillion years ago designed and built the Pearly Gates and entrapped us all.

Good Lord, I'd hate to be guilty of that overt. But never mind - you aren't either. That guy is GONE (I hope!)

L. RON HUBBARD

(Note: This HCO Bulletin is based on over a thousand hours of research auditing, analyzing the facsimiles of the reactive mind, and with the help of a Mark V Electrometer. It is scientific research and is not in any way based upon the mere opinion of the researcher. This HCO Bulletin is not the result of the belief or beliefs of anyone. Scientology data reflects long, arduous and painstaking research over a period of some thirty years into the nature of Man, the mind, the human spirit and its relationship to the physical universe. The data and phenomena discovered in Scientology is common to all minds and all men and can be demonstrated on anyone. Truth does not require belief to be truth any more than water requires anyone's permission to run down hill. The data is itself and can be duplicated by any honest researcher or practitioner. We in Scientology seek freedom, the betterment of Man, and the happiness of the individual and this comprises our attitude toward the data found. The data, however, is simply itself, and exists whatever the opinion of anyone may be. The contents of this HCO Bulletin discover the apparent underlying impulses of religious zealotism and the source of the religious mania and insanity which terrorized Earth over the ages and has given religion the appearance of insanity. As the paper is written for my friends it has, of course, a semblance of irreverence).

(Note: All our data on the whole track remains factual and is not taken from any implant. The only error released earlier was the time factors involved in GPMs).

HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex

HCO BULLETIN OF 23 SEPTEMBER 1968

Class VIII

C O N F I D E N T I A L

RESISTIVE CASES
FORMER THERAPY

Hypnotism, "psycho" analysis, "psychiatry" and other implant type therapies often key-in and jam the track.

These characters here, on any other planet and on the whole track dramatize implanting. The "therapy" involved would be a temporary relief brought by suggestion.

The wrong data of the "science" itself operates as a whole track lie. Getting well or able depends on establishing truth. These "scientific" lies are alterations of actual laws.

We often note electronics men have a rough case time. This traces to the lies Man uses for his "electrical science". As the subject is based on false assumptions, it itself tends to aberrate.

Therefore we get out of the road any former "therapy". We can rehab any moment of release in it, handle any overrun, etc.

We also do a new style Remedy B to get old therapies spotted and run back.

The only cases which hang up are

- (1) Unaudited cases (lies about grades, etc)
- (2) Drug cases (who seek in processing the delusion or madness which exhilarated them on drugs).
- (3) Former therapy cases. (In this or past lives.)
- (4) Out of valence cases.
- (5) Cases who continue to commit overts on Sen.
- (6) Case "audited" with their rods or grades out.
- (7) Seriously physically ill cases (where the illness makes too much PTP in PT).

Of all these the former therapy case is apt to be the roughest as any auditing session can be reactively mistaken for the "treatment". The next roughest is the drug case as a false exteriorization often occurs on an enforced basis and may go into restim.

Old therapies include the 2000 yr ago plus or minus Aescupleian drug treatment (hillabore) which produced a convulsion and coma and in which the nut practitioner made up as a God and "visited" the patient in a "dream". This outfit was all over the ancient world.

Also the Christian Church used (and uses) implanting (with a squirrel version of the "7s"). These gangsters were the Nicomidians from lower Egypt who were chased out for criminal practices (implanting officials). They took over the Niocene Creed before the year zero, invented Christ (who comes from the crucifixion in R6 75m years ago) and implanted their way to "power". The original Nicomidians date about 600 BC and people who were Christ data at 75 m years ago.

These were drug "therapies", actually implants.

Some drug takers go plowing back into early implants and drug therapies so the two get crossed up on a case.

To isolate the reason for a highly resistive case or high TA you can assess the above 7 items and get a clue. Don't limit it to this lifetime. And don't do it so as to key the person in hard on things he wasn't in. And don't do it unless the case is very hard to get a gain on.

Engram running of a crude sort can be found hundreds, thousands or billions of years ago and consists if it appears, of an overrun. They didn't know much about it and overran them badly.

Implants, psychoanalysis, psychiatry, hypnotism gets all snarled up with sex as these birds would commonly (and do) stage insane sex scenes. They violate the children and wives of officials even today to produce a degrade and to make a scene so insane that the "patient" if he remembers it really thinks he is insane. And if he tries to tell anybody (or if she tries to tell her husband) it's a prompt mess. So these "practitioners" hide their activities in this fashion.

The trouble with such former "therapies" and electric shock, etc. is that it

(a) groups track by the command of the practitioner

(b) appears to be a grouped track because Body Thetans flash their pictures at the moment it happens and so makes multiple pictures and hides the real scene, or

(c) sends the pc to the start of track WAY back and sticks him there out of PT.

The keynote of piloting through messes like this is to A. Know what kind of a mess it is and B. Don't EVER force a pc back track or into anything he doesn't want to confront easily.

Drugs force the person back into these messes and stick him.

One of these former therapy or drug messes is only hard to untangle because they are full of incredibles. The pc doesn't accept them or just try to see what's in them.

The basic rule in any case is reality is proportional to the amount of charge removed and so Reality can be increased simply by removing charge. Those surges of the needle as well as the EDs of the TA are "charge coming off."

Anything eventually resolves if the pc just keeps on getting charge off.

The earliest charge is the most important.

Charge off the exact grades is the most valuable.

But ANY charge off will make it, even on former "therapies"

L. RON HUBBARD

LRH:jpgn
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In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL,)
a California not-for-profit)
religious corporation,)

Plaintiff,)

vs.)

GERALD ARMSTRONG; MICHAEL WALTON;)
THE GERALD ARMSTRONG CORPORATION)
a California for-profit)
corporation; DOES 1 through 100,)
inclusive,)

Defendants.)

No. 157 680

**DECLARATION OF
MALCOLM NOTHLING
IN OPPOSITION TO
MOTIONS FOR SUMMARY
ADJUDICATION OF 20TH
CAUSE OF ACTION; AND
13TH, 16TH, 17TH &
19TH CAUSES OF ACTION
OF SECOND AMENDED
COMPLAINT**

Date: 4/21/95
Time: 9:00 a.m.
Dept: One
Trial: 5/18/95

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2
3 DECLARATION OF MALCOLM NOTHLING

4 I, Malcolm Nothling, declare:

5 1. I am over the age of 18 years. I am a resident in
6 Johannesburg in the Republic of South Africa. I have personal
7 knowledge of the matters set forth herein, and if called upon as
8 a witness herein I could testify competently thereto.

9 2. I am making this declaration in support of Gerald
10 Armstrong's opposition to motions by the Church of Scientology
11 International for summary adjudication.

12 3. I was an active member of the Church of Scientology
13 from 1979 through 1986.

14 4. Appended hereto is a true and correct copy of an
15 affidavit I executed November 11, 1992.

16 5. I am the plaintiff in the case of Malcolm Nothling vs.
17 Church of Scientology, et al., Case no. 88/19221, in the Supreme
18 Court of South Africa, (Witwatersrand Local Division), for
19 defamation by Scientology and unsatisfactory services from the
20 Scientology organization. I am the defendant in a case, the
21 number for which I do not have to hand, brought by Scientology in
22 the same Court. Scientology alleges in that case that I called
23 its organization leaders trained liars.

24 6. My case against Scientology was at one time set to go
25 to trial in August, 1991. Prior to that date I carried out a
26 search around the world for anyone willing to testify about the
27 policies and practices of Scientology, a central issue in my
28 case. The only person I located throughout my worldwide search

1 who was willing to come forward and testify was Gerald Armstrong.

2 7. Mr. Armstrong did fly to Johannesburg, but did not
3 testify because the Scientology organization was able to obtain a
4 postponement of the trial.

5 8. Mr. Armstrong was willing to testify without payment of
6 any kind and he was not paid. I knew of the legal threat to Mr.
7 Armstrong should he testify on my behalf, and I am aware of the
8 threat Scientology is to him outside the legal arena. I am aware
9 of Scientology's vindictive, threatening and dangerous policy and
10 practice of "fair game," and in my personal experience I know Mr.
11 Armstrong is "fair game."

12 9. My family and I spent many hours with Mr. Armstrong
13 while he was in South Africa in 1991. I know he is a person of
14 sincere religious beliefs, and that he was willing to risk attack
15 from Scientology to testify on my behalf because of those
16 beliefs.

17 10. I have personal knowledge that Scientology claims that
18 all of its policies and practices, including that of "fair game,"
19 and other antisocial policies such as "Black Propaganda," "Attack
20 the Attacker," and "Use the Law to Harass" are "religious
21 scriptures."

22 11. I know from personal experience and my post-Scientology
23 study that Scientology practices a totalitarian kind of mind
24 control that is dangerous to society and individuals,
25 particularly our young people. I lost my first child to
26 Scientology's mind control, and I have two other young children,
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1 so I am in a good position to know the danger.

2 12. I know that considerable information about
3 Scientology's mind control, policies and practices, and the
4 misrepresentations of L. Ron Hubbard, which Scientology uses to
5 pull people into its clutches, was made public for the first time
6 by Mr. Armstrong. This information is vital in freeing
7 individuals from Scientology's mind control.

8 13. Appended hereto is a a true and correct copy of
9 Scientology's "creed," on which it bases its claim that it is a
10 religion. I know that the "creed" is a sham. I know that
11 Scientology's management has never believed that all men have the
12 inalienable rights stated, but attacks ruthlessly anyone who
13 utters an opinion they do not like or speaks freely about their
14 "religious" policies and practices.

15 14. An immediate proof of that fact are Scientology's
16 attempts to silence Gerald Armstrong.

17 15. When I first became involved with Scientology I
18 believed its representations that it was in agreement with the
19 teachings of the Christian religion and that someone could be
20 both a Christian and a Scientologist. Through time it became
21 clear that these representations were lies, that the upper level
22 policies of Scientology taught that Christ and God are
23 electronically "implanted" ideas which aberrate and enslave
24 mankind, and that only Scientology's auditing has the way to
25 remove these "implants" from the mind of man.

26 16. In my experience Scientology's auditing does indeed
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28

1 remove these ideas. But it leaves the individual who remains in
2 Scientology unfeeling, uncaring, aggressive and anti-Christian.

3 17. It is important for the future of the uninformed,
4 particularly the youth around the world that Mr. Armstrong remain
5 free to impart and discuss his knowledge of the urgent public
6 issues of the "religion" of Scientology.

7 I declare under the penalty of perjury under the laws of the
8 United States of America and South Africa that the foregoing is
9 true and correct.

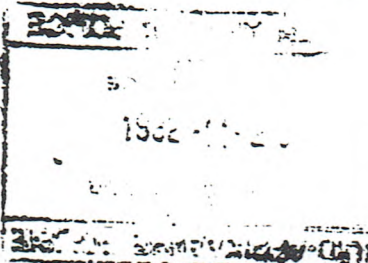
10 Executed in Thoung, South Africa, this 2
11 nd day of April, 1995.

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13 Malcolm Nothing
14 Malcolm Nothing
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SWORN STATEMENT

I Malcolm Claude Nothling, the undersigned, hereby state the following under oath:

- 1 I am a Caucasian male 38 years of age, born on 31/08/54.
- 2 I was a dedicated member of The Church of Scientology from 1979 - 1986.
- 3 I served in the Special Forces in the South African Defence Force. During this period I became highly skilled in handling firearms. This information was known by senior members of the Church of Scientology in South Africa.
- 4 In May 1986 I was requested to take up an administrative position at the Church of Scientology's headquarters in Los Angeles.
- 5 I arrived in Los Angeles on 6th June 1986 expecting to take up an administrative post that urgently needed to be filled. A week after arriving I was seconded to assist with demonstrations outside the Los Angeles Supreme Court in which the case between Lawrence Wollersheim and the Church of Scientology was being heard.
- 6 I was also promised by the Church of Scientology, on arrival in Los Angeles, that they would attend to some of my previous counselling that had gone horribly wrong. I was experiencing suicidal feelings and feelings of anger and destruction. It required a tremendous effort on my behalf to restrain myself. I had previously submitted a report to the Religious Technology Centre of my condition.
- 7 During June/July 1986 I was approached by two Scientologists from the San Francisco area, specifically Concorde. Unfortunately I cannot recall their names but one of them had a signwriting business in that area. They proposed that I should assassinate Larry Wollersheim. They would organise the weapon and whatever else I needed to accomplish this task. I cannot say with any accuracy whether or not they had been instructed to organise this from a higher level within the organisation. However, I now find it disturbing that Scientologists, myself included at the time, can consider this method of resolving what they consider to be a problem. In fact I blame the policy within the Church of Scientology known as the 'Simon Bolivar' which encourages these acts against supposed enemies. At the time I seriously considered committing this crime but believed that I was going to be used as the "fall guy" because it would have been easy thereafter to show that I was demonstrating and stating that I found myself in an unstable condition. When I declined I fell out of favour with the Church of Scientology and was expelled without a hearing and on trumped up charges for which I am currently suing the Church of



Scientology.

8 The above is true and I am willing to submit to a polygraph test or any other method to establish the integrity of my statement.

W. H. L.

[illegible]

1992-11-20

We of the Church believe:

That all men of whatever race, color or creed were created with equal rights;

That all men have inalienable rights to their own religious practices and their performance;

That all men have inalienable rights to their own lives;

That all men have inalienable rights to their sanity;

That all men have inalienable rights to their own defense;

That all men have inalienable rights to conceive, choose, assist or support their own organizations, churches and governments;

That all men have inalienable rights to think freely, to talk freely, to write freely their own opinions and to counter or utter or write upon the opinions of others;

That all men have inalienable rights to the creation of their own kind;

That the souls of men have the rights of men;

That the study of the mind and the healing of mentally caused ills should not be alienated from religion or condoned in nonreligious fields;

And that no agency less than God has the power to suspend or set aside these rights, overtly or covertly.

And we of the Church believe:

That man is basically good;

That he is seeking to survive;

That his survival depends upon himself and upon his fellows and his attainment of brotherhood with the universe.

And we of the Church believe that the laws of God forbid man:

To destroy his own kind;

To destroy the sanity of another;

To destroy or enslave another's soul;

To destroy or reduce the survival of one's companions or one's group.

And we of the Church believe that the spirit can be saved and that the spirit alone may save or heal the body.

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450

In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL,)
a California not-for-profit)
religious corporation,)

Plaintiff,)

vs.)

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THE GERALD ARMSTRONG CORPORATION)
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corporation; DOES 1 through 100,)
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Defendants.)

No. 157 680

**DECLARATION OF
JONATHAN ATTACK
IN OPPOSITION TO
MOTIONS FOR SUMMARY
ADJUDICATION OF 20TH
CAUSE OF ACTION; AND
13TH, 16TH, 17TH &
19TH CAUSES OF ACTION
OF SECOND AMENDED
COMPLAINT**

Date: 4/21/95
Time: 9:00 a.m.
Dept: One
Trial: 5/18/95

DECLARATION OF JONATHAN CAVEN-ATAACK

I, Jonathan Caven-Atack, declare:

1. I am over the age of 18 years. I am a citizen of and resident in the United Kingdom. I have personal knowledge of the matters set forth herein, and if called upon as a witness I could testify competently thereto.

2. I am making this declaration in support of Gerald Armstrong's opposition to motions by the Church of Scientology International for summary adjudication.

3. This declaration is a supplement to another headed "General Report on Scientology", and should be consulted in conjunction with that other declaration.

4. I am the author of the book **A Piece of Blue Sky** (ISBN 0-8184-0499-X), a 400-page history and analysis of Hubbard and his organizations published by Lyle Stuart Books in the United States.

5. A true and correct copy of my booklet, **The Total Freedom Trap - Scientology, Dianetics and L. Ron Hubbard**, is appended hereto as Exhibit A.

6. The testimony of Gerald Armstrong in his successful defence against the Church of Scientology before Judge Paul Breckenridge (Los Angeles Superior Court case no. C 420153) was an important source of information for both of these publications. Armstrong's testimony was supported by that of other witnesses and through the production of numerous documents. Scientology accepted the validity of these documents and was indeed trying to recover them to prevent publication. These documents included Hubbard's records of black magic ceremonies and hypnotic rituals he had performed. Testimony and exhibits also added to existing evidence concerning Hubbard and Scientology's immoral and illegal attacks upon their perceived opponents under the supposed "scriptural doctrine" of "Fair Game". Much of the evidence in the case was brought to light for the first time. This information has been of tremendous use in freeing victims of Scientology from its deceptions and pernicious effects.

7. As Judge Breckenridge ruled "In addition to violating and abusing its own members' civil rights, the organization over the years with

its 'Fair Game' doctrine has harassed and abused those persons not in the Church whom it perceives as enemies."

8. As soon as I began to openly discuss my views concerning Scientology's immoral practices, I became the target of "Fair Game". I have been "tricked", "sued" and "lied to", as yet I have not been "destroyed". In 1980, executives of Scientology's Intelligence Agency, the Guardian's Office, admitted to a United States court that the doctrine of Fair Game had never been withdrawn. On 22 July 1980, the Fair Game doctrine was "cancelled" for the first time in Scientology's history (Hubbard Communications Office Policy Letter, "Ethics, Cancellation of Fair Game More About"). On 8 September 1983, the Church of Scientology International rescinded this cancellation, re-instituting "Fair Game" as a scriptural doctrine (Hubbard Communications Office Policy Letter, "Cancellation of Issues on Suppressive Acts and PTSes"). Those Scientologists who are aware of the doctrine are obliged to follow it as if it were legally binding. It is a part of their contract with Scientology.

9. Scientology has admitted that the Guardian's Office had control of all Scientology organizations until 1982. It is claimed that at that time, the 1,100 "criminals" who comprised the international staff of the Guardian's Office were dismissed. Factually, many of these staff members have been re-employed. The various "bureaux" of the Guardian's Office were replaced by the Office of Special Affairs, the International Finance Police, and the Association for Better Living and Education. The Office of Special Affairs houses the successor organizations to the Guardian's Office intelligence branches. The former Branch Two, which dealt with "overt data collection", has been restyled "Office of Special Affairs Investigation" or "Invest". The former Branch One (B-1), which dealt with "covert data collection" and "covert operations", uses lawyers to employ private detectives to collect information and run harassment campaigns. I have been the subject of such campaigns for over eleven years.

10. Appended as Exhibit B is a recent example of the Fair Game campaign against me, an anonymous booklet called **Anatomy of a Propagandist**. The author of this booklet obviously had access to an unsworn deposition which has not been entered in any case. Such access could only have been gained through Scientology attorneys Bowles and Moxon. The booklet largely consists of fabricated or grossly exaggerated attacks upon my character. I am currently engaged in litigation against Scientology in the UK for malicious falsehood for the publication of

similar libels and a campaign to destroy my public repute by making anonymous complaints against me.

11. Hubbard ordered his subjects to "attack the attacker". Rather than address the real concerns raised by legitimate enquiry into its practices and policies, Scientology carries out an ad hominem attack on the person raising the concerns. This practice, which Hubbard dubbed "black propaganda" or "dead agenting", is designed and intended to destroy the dissenter's character and credibility so as to draw attention away from legitimate concerns. In this way, Scientology need not reform its practices and can continue with its antisocial behaviour, by bullying critics into silence. Numerous individuals have been silenced through such intimidation.

12. I am aware that Gerald Armstrong has been the subject of an international "Fair Game" campaign. For example, in 1987, after Armstrong and Scientology had supposedly made peace, I was contacted by Richard Palmer, a journalist at the London **Sunday Times** newspaper. Palmer told me that he had just been visited in London by private detective Eugene Ingram an employee of Scientology attorneys Bowles and Moxon. Palmer gave me the business card Ingram had given him and a video tape extracted from surveillance tapes of Armstrong illegally taken by Scientology in or about 1985. Scientology has never relented in its attack upon Armstrong, taking the position that after his "settlement" Armstrong should be entirely silent about Scientology, but that Scientology could continue its campaign of defamation against him. It is my understanding that under this "settlement agreement" Scientology is requesting that Armstrong pay \$50,000 for each statement he makes to anyone concerning Scientology. This obtains even if his statements are made to correct Scientology's character assassination of him. It seems unbelievable that the United States courts could become party to this use of the Fair Game law.

13. I sincerely believe that a guarantee of Armstrong's freedom of speech is vital so that individuals can make informed decisions about Scientology. I cannot believe that any rational individual would join Scientology if they were aware of the proven statements of Gerald Armstrong. Denying such informed consent would be tantamount to intellectual fascism, and comparable to the Nazi book burnings.

14. Since 1954, Scientology has drawn upon its constitutional right to style itself a "religion" in the United States. The same right is of

course granted to other organizations with their origins in black magic and an antidemocratic manifesto. I have known Gerald Armstrong for almost eleven years. He is a man of integrity and honour. He has nothing to gain and everything to lose in his brave struggle to tell the world the truth about Hubbard and Scientology. I know that he follows this path as a matter of religious conviction. He feels that he cannot take the easy way out, but must stand up for the truth, even though he is a lone individual standing up to an organization with hundreds of millions of dollars and tens of thousands of members. If Hubbard is to be seen as the founder of a religion, surely he must be subjected to the same scrutiny that other religious leaders are subjected to. As a Christian might analyse Buddhism, so Armstrong has the right to analyse from his own religious perspective the life and teachings of Hubbard and the activities of Hubbard's "church". The United States Constitution upholds freedom of belief, so must also uphold freedom of disbelief. The Constitution also upholds free speech. Scientology does not charge Armstrong with defamation, but seeks to prevent him from telling the truth. Scientology does this to protect its own economic interests by subverting the free will of its members through information control.

15. It is ridiculous to think that a Christian church would use the judicial system to prohibit one of its former parishioners from talking about the Trinity or the historical truth of the life of Jesus. It is frightening to think that the courts may silence Armstrong who is after all pointing out the irrefutable truth that Hubbard was a black magician who specialised in controlling his victims through hypnosis and exploitative persuasion. Hubbard's own documents and many witnesses support this view conclusively.

16. I have researched and have knowledge concerning Scientology's Fair Game operations against Armstrong's attorney Michael J. Flynn. Flynn was an opponent of Scientology from 1979 to 1986. He championed the victims of Scientology and bravely resisted its smear campaigns, intimidation and legal attacks upon him. In my own dealings with Flynn towards the end of 1986 it became apparent that he was weary of the unrelenting harassment. It is my sincere belief that Flynn was bullied into submission. This opinion is supported by Flynn's failure to support Armstrong in his courageous stand against Scientology's Fair Game litigation. I have seen documents which purport to be part of a settlement between Flynn and Scientology and can only suppose that he has been subject to a "settlement" which has scared him out of supporting his client.

17 In November 1994, the Church of Scientology sought to compel my deposition testimony in its case against Armstrong. Under English law, deposition testimony can only be obtained if a witness is unavailable to give testimony at trial. In April 1995, I gave an undertaking to the English court that I was willing to give testimony in this action. My offer has been declined. I can only interpret this as a desire on the part of Scientology to perform cross-examination without giving Armstrong the opportunity to examine me.

I declare under the penalty of perjury under the laws of the United States of America and the United Kingdom that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Radcliffe-on-Trent, England, this 9th
day of April, 1995,

J. Caven-Attack
Jonathan Caven-Attack

GENERAL REPORT ON SCIENTOLOGY - DECLARATION OF JONATHAN CAVEN-ATAACK

I, Jonathan Caven-Atack, declare that I am over the age of 18 years. I am a citizen of and resident in the United Kingdom. I have personal knowledge of the matters set forth herein, and if called upon as a witness I could testify competently thereto. This declaration is supplemental to my declaration in support of Gerald Armstrong's opposition to motions by the Church of Scientology International for summary adjudication.

Background and expertise

1. I was a member of the Church of Scientology from December 1974 to October 1983. During that time I undertook the equivalent of 24 of the 27 available "levels" of Dianetic and Scientology "auditing" ("auditing" is supposedly a form of counselling). I also completed eight courses related to "auditor" or counsellor training as well as courses in recruitment and administration. As a part of my "indoctrination" (the word used by Hubbard for training), I read more than 20 of Scientology founder L. Ron Hubbard's textbooks and listened to about 150 taped Hubbard lectures. I received "auditing" and "auditor" training at Scientology Missions or Churches in Birmingham, Manchester and at the British headquarters at Saint Hill, near East Grinstead.
2. In January 1983, the Church of Scientology published a list of 611 people who had been "declared Suppressive Persons" (JCA-1). Shortly thereafter, I was informed that one of my employees had been similarly "declared a Suppressive Person", and shown Scientology Policy Directive 28, "Suppressive Act - Dealing with a Declared Suppressive Person" (JCA-2). This order forbids Scientologists any contact with any person "declared Suppressive". This policy is known within Scientology as "disconnection". For six months, I wrote letters questioning the "Suppressive Person declare" issued on my employee. During that time I made enquiries of the Master at Arms, or Ethics Officer, at Saint Hill, of the Special Unit, of the International Justice Chief, of the Executive Director International and ultimately of L. Ron Hubbard. The responses I received were evasive.
3. In September 1983, I decided to conduct my own investigation of the Church of Scientology. I was unwilling to have my communication controlled and my freedom of association denied, and uneasy with the attitude of Scientology's new management, who described themselves as "tough" and "ruthless" (JCA-3), and unhappy at the high price charged for Dianetic and Scientology services ("auditing", for example, had risen from \$6 per hour in 1978 to over \$100 per hour) (JCA-4).
4. Since my resignation from the Church of Scientology, in October 1983, I have assembled a large collection of Scientology and Hubbard related materials, and interviewed well over a hundred former members, including a number of former Hubbard aides. I have also read thousands of pages of court rulings, government enquiry reports, affidavits and sworn testimony relating to Hubbard and Scientology. This research led to the publication, in 1990, of my book *A Piece of Blue Sky*, which is a history of Hubbard and his organizations. This book has been cited as a principal source of reference in academic papers by professor of sociology and history of religion Stephen Kent ("International Social Control by the Church of Scientology", presented at the Society for the Scientific Study of Religion, November 1991) (JCA-5) and by professor of neuropsychiatry Louis Jolyon West ("Psychiatry and Scientology", presented as the "Distinguished Psychiatrist" lecture, American Psychiatric Association Annual Meeting, Washington DC, 6 May 1992) (JCA-6).
5. I have been retained in connection with the preparation of many court actions in which consideration of Scientology has arisen. In 1984, I assisted in assembling documents as evidence in a child custody case put before Mr Justice Laley ("Re: Wards B & G"). In 1987, I provided documents and affidavits in the successful defence of Russell Miller's biography of Hubbard, *Bare-Faced Messiah*, heard before Mr Justice Vinelott, in the English High Court. I also prepared documents for the defence of Miller's book in the USA, Canada and Australia. I have been consulted by litigants in the US, Canada, Brazil, Australia, Italy, Switzerland, Spain and

the UK. In these cases, I have prepared documents, recommended relevant documents for discovery, and contacted or recommended witnesses.

6. I was the principal researcher for Russell Miller's *Bare-Faced Messiah*, and was also consulted by Bent Corydon for his *L. Ron Hubbard: Messiah or Madman* and by Stewart Lamont for his *Religion Inc.* I was the principal researcher for the chapter on Scientology in Jean Ritchie's *Secret World of Cults*. I was also the principal researcher for *BBC Panorama* and *TVS* programmes about Scientology (both broadcast in 1987). I have been consulted by television and radio producers, and by journalists throughout the world.

L. Ron Hubbard's intent:

7. Scientology was devised by L. Ron Hubbard as a means of gaining authoritarian control over those deceived into joining any of his many organizations. Hubbard cynically constructed a set of hypnotic techniques which masquerade as therapy and create progressive psychological dependency upon the organizations of Scientology. Hubbard also hid behind the pretence of religion.

8. I can give evidence regarding the techniques commonly employed by Scientology organizations to recruit followers, to create and maintain their loyalty and to sell them courses, supposed counselling, Scientology films, tapes, books and "Special Properties" (highly priced special editions of Hubbard works and Hubbard memorabilia). Although I have no qualification in psychology or psychiatry, I have had contact with several hundred former Scientologists in the last ten years, and feel able to estimate the effect of Scientology upon these former members.

L. Ron Hubbard and the claims of Dianetics and Scientology

9. Despite possession of a massive archive of Hubbard's private papers, including numerous handwritten and illustrated black magic rituals and accounts of Hubbard's extensive drug abuse (JCA-7), Scientology management still deceive Scientologists by perpetuating Hubbard's fictitious claims about his life. Scientology materials make many false claims, including the following: that Hubbard was a wounded and decorated war hero (JCA-8, JCA-9) he suffered from an ulcer (JCA-10, JCA-11) and never saw combat (JCA-12); that Hubbard was a "nuclear physicist" (JCA-13) - he failed a short course in "atomic and molecular" physics which was part of the degree course he failed to complete (JCA-14); that Hubbard had studied for five years as a teenager with holy men in India, China and Tibet (JCA-15, JCA-16, JCA-17) - he spent less than three weeks in China and did not visit India or Tibet (JCA-18, JCA-19, JCA-20). These are a few of the many deceptions created by Hubbard and perpetuated by the cynical managers of Scientology. Gerald Armstrong and Vaughn and Stacey Young were formerly in charge of Scientology's immense "Hubbard Archive" and can testify to this deliberate deception.

10. After a chequered career as the author of adventure stories, Hubbard released his first supposed therapy text, *Dianetics: the Modern Science of Mental Health*, in 1950 (JCA-21). This book is still sold by the Church of Scientology, which claims sales in the millions.

11. Dianetics was in fact a reworking of techniques abandoned by Freud, where traumatic memories are supposedly re-experienced (JCA-22). In the book *Dianetics*, Hubbard asserted that memories of physical pain or unconsciousness ("engrams") are "the single and sole cause of aberration and psycho-somatic illness" (ibid, p.68). Such buried traumata supposedly cause people to react to situations without conscious reflection and constitute a "reactive mind".

12. Hubbard adopted Freud's notion that traumata form in "chains" and that it is necessary to find the earliest traumatic memory on such a chain to relieve its symptoms. In *Dianetics*, Hubbard asserted that the earliest such traumatic memories are birth and prenatal experiences.

13. The book *Dianetics* describes a purported system of therapy which will supposedly release the individual from compulsions, neuroses, repressions, psychoses, arthritis, bursitis, asthma, allergies, sinusitis, coronary trouble, high blood pressure, the common cold, myopia, schizophrenia, manic depression, dipsomania (ibid. pp 51-52, also p 92), visual and hearing deficiencies (ibid. pp 10-11), dermatitis, migraine, ulcers (ibid. p 92), tuberculosis (ibid. p.93), morning sickness (ibid. p.156), conjunctivitis (ibid. p.126). Hubbard also wrote that his techniques would bring about an individual with "complete recall of everything which has ever happened to him or anything he has ever studied", who would be capable of performing a calculation which a "normal [person] would do in half an hour, in ten or fifteen seconds" (ibid p.171). In later works, Hubbard also asserted that he had found psychological cures for paralysis (JCA-23, p 9), blindness, cancer (JCA-24) and leukaemia (JCA-25, JCA-26), and that his techniques had even be used to raise the dead (JCA-27, p.170).

14. In *Dianetics: the Modern Science of Mental Health*, Hubbard asserted that his techniques would work on anyone not suffering from brain damage (JCA-21, p.17), and that the outcome of therapy would be a "Clear". A Clear would be free from the disabilities, and possessed of the capabilities, listed in the foregoing paragraph. In 1971, in the Scientology publication "Advance!", the following claim was made: "A Clear has over 135 I.Q., a vibrant personality, glowing health, good memory, amazing vitality, self-control, happiness and more. The most valuable thing you can do for yourself, and for your family, friends and Mankind is attain the state of Clear. You can achieve Clear - not in years but within months through the most advanced technology of the human spirit - Scientology" (JCA-28). A 1988 issue of "The Auditor", a Scientology magazine, asserts that "A Scientology CLEAR has: Over 135 IQ, Creative imagination, Amazing vitality, Deep relaxation, Good memory, Strong will power, Radiant health, Magnetic personality" (JCA-29). Such claims are repeatedly made in literature produced by the Church of Scientology. For instance, a 1991 issue of Scientology's "Celebrity" magazine states: "Scientology auditing can help you - you can get - A higher IQ to handle your problems. . . More energy to make more money - Better health. . . More years to live." (JCA-30).

15. In 1952, Hubbard incorporated notions of the spirit (or "thetan") and reincarnation into his system. He asserted that we have all existed as spiritual beings for trillions of years (by the 1970s, he was talking of quadrillions). In the 1950s, Hubbard coined the phrase "Operating Thetan", meaning a spirit capable of "operating" separately from its human body ("exterior"). The goal of Scientologists is to be "exterior with full perception". Hubbard defined "Operating Thetan" as the "ability to be at cause knowingly and at will over thought, life, form, matter, energy, space and time, subjective and objective." (JCA-31). Currently, eight "Operating Thetan" levels are available to Scientologists, most of which consist of a form of exorcism, sold to Scientologists for over \$300 per hour (JCA-32). Scientologists come to believe that they are possessed by thousands of spirits which can of course lead to mental illness.

16. Many of the fundamental ideas of Scientology can be found in the works of black magician Aleister Crowley. Hubbard recommended Crowley books to his followers and called Crowley "my very good friend" (JCA-33). As with all other magical systems, Scientology seeks to strengthen the will of the individual so that the physical world and other people can be controlled by intention alone. Scientologists believe that by undergoing Hubbard's "processes" they will ultimately be able to order events through "postulates" or wishes. Hubbard promised godlike powers to his followers.

The religious nature of Scientology

17. In a lecture given in 1952, Hubbard asserted: "In 1938 I codified certain axioms and phenomena into what I called SCIENTOLOGY" (JCA-23, p.8). Factually, Hubbard had briefly lost control of *Dianetics*, so restyled his ideas "Scientology" (He was probably unaware that the word was already in use, meaning "pseudoscientific ideas"). In April 1953, Hubbard wrote to the head of the Hubbard Association of Scientologists, Helen O'Brien, asking for her opinion on "the religion angle" (JCA-34). In December 1953, Hubbard registered the Church of

Scientology, and a parent body called the Church of American Science, in Camden, New Jersey (JCA-35, JCA-36, JCA-37). In February 1954, Hubbard's associate, Burton Farber, incorporated the Church of Scientology of California (JCA-38). Within a few years all organizations affiliated to Hubbard had been restyled "Churches" of Scientology. These Churches tithed 20 percent of their income to Hubbard's Church of American Science (JCA-35). In March 1954, Hubbard announced that graduate auditors "can be given any one of three or all of the following certificates: DOCTOR OF SCIENTOLOGY, FREUDIAN PSYCHO-ANALYST, DOCTOR OF DIVINITY." (JCA-35)

18. Numerous claims have been made by Hubbard and his organizations for the religious nature of Scientology. In 1954, Hubbard said, "a Scientologist has a better right to call himself a priest, a minister, a missionary, a doctor of divinity, a faith healer or a preacher than any other man who bears the insignia of religion in the Western world" (JCA-38). In a Bulletin of 18 April 1967, Hubbard asserted that "Scientology is a religion by its basic tenets, practice, historical background and by the definition of the word 'religion' itself. Scientology is a Religious practice in that the Church of Scientology conducts basic services such as Sermons at Church meetings, Christenings [sic - Scientology makes no claim to be a Christian Church], Weddings and Funerals." (JCA-39). In a Bulletin of 4 May 1972, Hubbard asserted "Dianetics is a science which applies to man, a living organism; and Scientology is a religion." (JCA-40). In the textbook *What is Scientology?*, first published in 1978, Scientology is defined as "an applied religious philosophy" (JCA-17, p. 3). Most Scientology textbooks contain a disclaimer such as the following "This book is part of the works of L. Ron Hubbard, who developed Scientology applied religious philosophy and Dianetics spiritual healing technology." (JCA-41)

19. The Church of Scientology offers a "Minister's Course" to its members (JCA-42). After two weeks of training, Scientology ministers wear dog collars and the Scientology cross and conduct Sunday services, weddings, naming ceremonies and funerals (JCA-43). The Church of Scientology has in the past commissioned religious experts such as F. G. Parrinder (JCA-44) and Frank Flinn (JCA-45) to prepare reports or give testimony to the effect that Scientology is a bona fide religion. The booklet "The Corporations of Scientology" (JCA-46) claims that "In the Scientology religion, the scriptures are all the spoken and written words of L. Ron Hubbard." All Scientology organizations are licensed by the Religious Technology Center, a California based corporation, and sign an agreement accepting that the Dianetics and Scientology teachings are "scripture" (JCA-47). Hubbard's "scriptures" are incontrovertible: "It is hereafter firm Church policy that LRH [Hubbard] ISSUES ARE TO BE LEFT INTACT AS ISSUED [emphasis in original]. No one except LRH can revise his issues." (JCA-48). Since Hubbard's death in 1986, his work has been written in stone.

20. The ambiguity of Scientology's religious claims is evident in a document which discusses the establishment of a Scientology organization in Japan: "Even the point of whether we go religious or non-religious has to be covered as it will determine whether the books mention the Church [of Scientology] or not and whether they have Church symbols, etc." (JCA-49)

21. Scientology has been granted religious tax-exemption in Australia and the USA. However, in *Regina v. Segerdal*, in July 1970, the then Master of the Rolls, Lord Denning ruled that Scientology is not a religion (JCA-50).

Techniques of Persuasion and Selling Techniques

22. Scientology is a proselytizing faith and all Scientologists are termed "Field Staff Members" and expected to effect conversions. The methods of conversion are spelled out in the Hubbard memoranda reissued in the "Field Staff Member Kit" (JCA-51), in the "Registrar Drills" (JCA-52) and in "FSM Breakthrough - New FSM TRs - Controlling a Conversation" (JCA-53). I was extensively trained in recruiting at the Birmingham Mission of the Church of Scientology, in 1975. The Field Staff Member is instructed to discover through questioning what is "ruining" a person's life (termed "the ruin" by Hubbard) and to exploit any "fear of worsening". Having brought

the individual face to face with their weakness, the Scientology Field Staff Member "brings to understanding" - the understanding that Scientology can solve whatever problem is disclosed.

23. In a tape-recorded lecture Hubbard said the following: "all the social machinery people have actually breaks down before direct intention. But the thing that causes difficulty in moving people along this line of methodology, has a great deal to do with the invasion of privacy. I won't call it privacy because that dignifies it. You have to be willing to invade privacy, very definitely ... If you have a hard time invading people's privacy, you'll have a hard time 8-Cing [controlling - "8-C", literally "infinite control"] them into a chair in an HAS Co-audit unit [Hubbard Apprentice Scientologist], first PE [Personal Efficiency Course], and so forth. Because you think they have rights. Nah [sic]! They don't have any rights! What do you mean? What do they have - what has rights? That machinery? Those dramatizations? Those computing circuits? You mean those things have rights? Hah! Pish-pash [sic] ... If you invade this guy's privacy that just walked in, believe me, he walks straight in." (JCA-54).

24. Hubbard asserted that every individual has a particular emotional level or "tone" (JCA-55, JCA-56), and during recruiting it is necessary to approximate the emotional condition of the would be recruit (Scientologists do elaborate role-playing of emotional states, including the "Mood Training Routines"), so creating rapport. Using emotional manipulation, the individual is reduced to a depressed condition where he or she will realize a desperate "need of change" in his or her life (JCA-57).

25. Hubbard called non-Scientologists "woys" (JCA-58) or "raw meat" (JCA-59) and said that non-members are "dead" in the "head" (JCA-60) - in a hypnotic daze and therefore easily controllable. Non-Scientologists are held to be in the grip of their "Reactive minds" and so incapable of logical decision. Consequently, Field Staff Members are urged not to discuss the ideas of Scientology, but to play upon the emotional weaknesses of the potential recruit (JCA-51, JCA-61).

26. The most used method of recruitment in Scientology is the Oxford Capacity Analysis Personality Test or "OCA" (JCA-62). This derives from Scientology's "American Personality Analysis" of the early 1950s, which in turn was constructed from existing tests devised by psychologists. The OCA has no connection with Oxford, let alone Oxford University. The original test has long been outdated and was rewritten by individuals with no background in psychology or personality testing. Further, it is made clear in internal literature that far from being a "free" test, its function is solely to recruit people into Scientology (JCA-63).

27. Hubbard openly employed "hard-selling" techniques (JCA-51, under "hard sell", JCA-64). Sales staff undertake frequent (often daily) "hard-sell drilling". Scientology organizations use a printed manual called the "Hard Sell Reference Pack". I frequently experienced the use of such techniques. For instance, on my first visit to the British headquarters, at Saint Hill, in August 1975, I was taken to a staff recruiter at 11 p.m. and remained with her until about 1 a.m. My refusal to join Scientology's paramilitary "Sea Organization", which entails a "billion year" commitment (Scientologists believe in reincarnation), was met with progressively more stern entreaties. I was shown a Hubbard memorandum, which I was assured was entirely secret, which asserted that the third world war was imminent and that the Church of Scientology would be the only organization capable of surviving this holocaust and governing the world beyond it. According to this memorandum, this was the real purpose of the Sea Organization, despite Hubbard's published assertion that Scientology is "non-political". As a last stab, the recruiter told me that anyone who refuses to join the Sea Organization is insane.

28. On one occasion, between June and August 1982, I spent thirteen hours being given a sales interview by Scientologist Peter Buttery at my apartment in East Grinstead. In the same year, I was visited by the same Scientology salesman who had brought Scientologist money-lender Lee Lawrence with him. They attempted to persuade me to borrow #7,000. The assertion was made that after "upper level" Scientology counselling it would be easy for me to recoup

the money and pay back the loan and the 30 percent per annum interest. Lawrence's loan applications had to be approved by Scientology (JCA-65).

29. Scientology sales staff, or "registrars", rapidly form a picture of an individual's assets and borrowing capacity. I have dealt with many individuals whose financial security was undermined by their involvement with Scientology.

30. Scientologists are told that if they fail to undertake certain courses they will be "at risk" (JCA-66). Ominous warnings are often given to those who declare an intention to leave the Churches of Scientology (JCA-67).

31. Sophisticated sales techniques are acquired by Scientology registrars on the "Registrar Salesmanship Course" (JCA-68), and through the application of material in the "Hard Sell Reference Pack" (JCA-64). Scientology registrars spend long hours "drilling" these techniques and learning how to overcome resistance (JCA-52). Such drilling continues throughout the registrar's career, especially after a failure to sell.

32. Hubbard made many extravagant and unfounded claims for Scientology and these are often used by registrars. For instance, in Flag Mission Order 375 Hubbard said: "Advanced Courses [in Scientology] are the most valuable service on the planet. Life insurance, houses, cars, stocks, bonds, college savings, all are transitory and impermanent ... There is nothing to compare with Advanced Courses. They are infinitely valuable and transcend time itself" (JCA-69). In a magazine article, Hubbard said: "For thousands of years men have sought the state of complete spiritual freedom from the endless cycle of birth and death and have sought personal immortality containing full awareness, memory and ability as a spirit independent of the flesh ... In Scientology this state has been attained. It has been achieved not on a temporary basis, subject to relapse, but on a stable plane of full awareness and ability, unqualified by accident or deterioration." (JCA-70).

33. The Scientology attitude towards new recruits is unequivocal. In a 1959 Bulletin, which is still circulated, Hubbard said "NEVER let anyone simply walk out. Convince him he's loony if he doesn't gain on it [an auditing procedure] because that's the truth" (JCA-71). In a Policy Letter which is still a part of most Scientology courses, Hubbard said: "When somebody enrolls, consider he or she has joined up for the duration of the universe - never permit an 'open-minded' approach ... If they enrolled, they're aboard, and if they're aboard, they're here on the same terms as the rest of us - win or die in the attempt. Never let them be half-minded about being Scientologists ... When Mrs. Pattycake comes to us to be taught, turn that wandering doubt in her eye into a fixed, dedicated glare ... The proper instruction attitude is '... We'd rather have you dead than incapable.'" (JCA-72). In "Critics of Scientology", Hubbard asserted "it is totally hopeless and fatal not to be a Scientologist" (JCA-73).

34. In a lecture, still sold as part of a Scientology course, Hubbard said "But what kind of a government and what kind of a weapon is really serious? Not a weapon that destroys mud. A weapon that destroys minds, that's serious. Out of the body of knowledge which lies before you [i.e., Scientology] a sufficient technology is [sic - exists?] to take over, seize and handle any government on the face of the Earth ... You can control men like you would control robots with those techniques ... Contained in the knowable, workable portions before your eyes there are methods of controlling human beings and thetans [spirits] which have never before been dreamed of in this universe. Control mechanisms of such awesome and solid proportions that if the remedies were not so much easier to apply, one would be appalled at the dangerousness to beingness [sic] that exists in Scientology ... This universe has long been looking for new ways to make slaves. Well, we've got some new ways to make slaves here." (JCA-74). In private papers revealed to a California court in 1984, Hubbard said "Men are my slaves" (JCA-75).

The hypnotic nature of Scientology

35. An analysis of Hubbard's early publications on Dianetics makes it clear that he had practised hypnosis since his teens. He claimed vast experience as a hypnotist. Dianetics was a fusion of Freudian technique and "light

trance" hypnosis. Hubbard also made it clear that aspects of his original Dianetic technique are hypnotic. Although these practices were briefly suspended in the 1950s, they have been back in full use for more than a decade in all of Scientology's many organizations. For example, in a 1950 lecture, Hubbard withdrew the system of counting people into a state of "reverie" prior to a Dianetic session, "Sometimes people go into a hypnotic trance by accident with this count system" (JCA-76). In his 1951 book *Science of Survival* Hubbard said "When an auditor finds his pre-clear unusually suggestive [sic], he should be very careful what he says to the pre-clear. He may notice that a pre-clear after he closes his eyes will begin to flutter his eyelids. This is a symptom of the very lightest level of hypnotic trance." (JCA-77). However, in the current "Book One" Dianetic procedure, the auditor is to "Count slowly and soothingly from 1 to 7" until "the preclear's eyes close and you notice his eyelids flicker" (JCA-78).

36. Hubbard said that Dianetics can be used to "play on another individual like a good organist plays on a Wurlitzer. Knowing by observation, the push buttons of another person - or, as in Political Dianetics, a society - the organist can play whatever piece he likes at will." (JCA-79)

37. Recipients of Dianetic "processing" will tend to invent "memories" (for example, believing that they are reliving birth and conception or "past lives" in extra-terrestrial societies), so causing False Memory Syndrome. The techniques of Scientology exploit this collapse of distinction between memory and imagination to induce euphoria and dependency. In "Training Routine Zero", a fundamental practice of Scientology, individuals are expected to spend "some hours" sitting immobile and staring at another similarly immobile Scientologist (JCA-80). This leads to a hypnotic state in which the Scientologist hallucinates and experiences spatial distortion. In the Scientology "process" "Opening Procedure by Duplication", the Scientology "auditor" commands the recipient to walk between two tables, picking up the book on one and the bottle on the other and guessing their weight and temperature. This procedure is received in two hour sessions, and as many as 18 sessions can be administered over a few days. The procedure leads to spatial dissociation, which the Scientologist is told indicates that he has left his human body although all of his perceptions are still channelled through it (JCA-81).

The Sea Organization

38. The Sea Organization, or Sea Org, was created by Hubbard in August 1967. According to promotional literature, "The Sea Org is the only guarantee of the survival of Scientology technology on this planet. Without the survival of Scientology technology, there is no hope for the survival of Man." (JCA-82).

39. Speaking of Sea Org members, Hubbard said "the whole value of a being is to his group and not to himself at all..." (JCA-83)

40. Hubbard asserted that the Sea Org is "fabian", and redefined that word to mean "using stratagem and delay to wear out an opponent" (JCA-84). Hubbard wanted the Sea Org to be seen as "a determined but elusive and sometimes frightening group". He also asserted that the Sea Org has "tough discipline", and that "Only those members who are not used heavily aboard [ship] or on mission seem to go slack." (JCA-85).

41. The Sea Org is a paramilitary organization, in which members wear pseudo-naval uniform and hold pseudo-naval ranks (JCA-86). Members also wear the equivalent of campaign ribbons (JCA-87). Scientology teaches reincarnation, and Sea Org members sign a contract for a billion years (JCA-88). Elsewhere this is styled "a pledge of eternal service". This text adds: "New Sea Org members undergo rigorous basic training. Sea Org members, having devoted their lives to their religion, work long hours for little pay and live a communal existence" (JCA-89). The recruit gives away certain rights by signing the Sea Org contract: "I ... fully and without reservation, subscribe to the discipline, mores and conditions of this group and pledge to abide by them" (JCA-88). The Sea Org member is also expected to abide by the "Code of a Sea Org Member": "1. I promise to uphold, forward and carry out Command Intention ... 5. I promise to uphold the fact that duty is the Sea Org

Member's true motivation, which is the highest motivation there is ... 11. I promise to accept and fulfill to the utmost of my ability the responsibilities entrusted to me whatever they may be and wherever they may carry me in the line of duty ... 17. I promise through my actions to increase the power of the Sea Org and decrease the power of any enemy." (JCA-90).

"Ethics"

42. In the mid-1960s, Hubbard began to experiment on his followers with "ethics penalties" - the use of humiliating and degrading practices to enforce unthinking compliance with his orders. In the "Policy Letter", "Awards and Penalties", Hubbard outlined "penalties" that staff members must suffer, prefacing his comments with this statement "Does not apply to Sea Org which has its own, much worse." Under "Non-existence", Hubbard wrote, "Must wear old clothes. May not bathe. Women must not wear make-up or have hair-do's. Men may not shave. No lunch hour is given and such persons are expected not to leave the premises." (JCA-91). In the "Penalties for Lower Conditions", Hubbard ordered that staff in a certain "ethics condition" should be subjected to "day and night confinement to org premises." (JCA-92). This was reiterated in a subsequent "Policy Letter" (JCA-93). Speaking of his "ethics penalties", Hubbard asserted "one ex-Naval person, reading them realized suddenly, 'you could kill a man with the penalties of non-existence, by work and no sleep'" (JCA-94).

43. In 1968, Hubbard introduced the practice of "overboarding". A photograph of this practice was published in Scientology's magazine "The Auditor", issue 41, with the caption: "Students are thrown overboard for gross out tech and bequeathed to the deep!" (JCA-95). Overboarding was used as a punishment for failure to comply exactly with Hubbard's orders. At about the same time, the tank punishment - where individuals were put into the bilge tanks and kept awake for 84 hours - and the chainlocker punishment - where individuals were put in the dark, cramped, waterlogged, rat-infested and filthy chainlocker. Witnesses have said that even children were put in the chainlocker at Hubbard's order.

The Rehabilitation Project Force

44. In 1973, Hubbard introduced the "Rehabilitation Project Force" ("RPF") (JCA-96). Disobedient Sea Org members have been assigned to the RPF from that time. The RPF replaced the "Rehabilitation Unit" (JCA-96) of which Hubbard said "The unit is worked hard during the day on a rigorous schedule...". This unit had replaced the "Mud Box Brigade" - "persons appointed to clean mud boxes, fuel lines, water lines, bilges, etc." (JCA-97). Few of the internal memoranda which apply to the RPF are publicly available. All are relevant to litigation, as they show the true character of Scientology and the inhuman pressures brought to bear upon Sea Org members. The designations for RPF material are "Executive Directive 965 Flag 'RPF Reinstated'" and all additions and "Flag Order 3434" and all additions (there are at least 56 memoranda in this series, numbered FO 3434-1 to FO 3434-56).

45. The RPF is virtually a labour and thought reform camp. Members are forbidden communication with any but their "bosun" (the head of the RPF); they have to comply immediately with any order, they sleep even shorter hours than other staff; they eat even poorer food than other staff (often rice, beans and porridge for weeks. For some time in Florida, "RPFers" were fed left-over food) (JCA-98); they sleep in "pig's berthing", i.e. without beds (JCA-99, JCA-100); they do hard labour and menial tasks, including toilet and sewer cleaning; they are rarely permitted time off; they receive one quarter of the already derisory pay of other staff (JCA-101), and they have to write down

detailed "confessions", which may be published by the organization (JCA-102, JCA-103). Finally, an RPF sentence is open-ended and may last for as much as four years. Failure to comply leads to posting to the "RPFers RPF", which according to witnesses has consisted of false imprisonment. False imprisonment or "isolation" is a part of the "technology" of Scientology (JCA-104, JCA-105). There are hundreds of former members who suffered the RPF.

Isolation watches

46. While aboard ship during the early 1970s, Hubbard introduced "isolation watches" where an individual is forcibly confined after a "psychotic break" (a mental breakdown, usually caused by Scientology's hypnotic procedures). Such people can be held for weeks under 24-hour guard (JCA-104, JCA-105). The procedure is referred to as "babywatching" or "babysitting" in Scientology. In 1994, The Independent newspaper in Britain published an account of "babywatching" (JCA-106). HCO Ethics Order 2543 of 28 September 1993, concerning Heidi Degro, makes it clear that the practice is still in use (JCA-105). Indeed, the practice forms a part of Scientology's incontrovertible "scripture" (JCA-104).

The Erosion of Critical Thinking

47. I have spent over ten years interviewing and counselling former Scientologists, and have come to the firm conclusion that Dianetics and Scientology tend to erode independent decision making and critical thinking. Hubbard claimed that his techniques were the only valid approach to mental and spiritual well-being. He derided all psychotherapeutic practices (JCA-107). Hubbard asserted with regard to psychology and psychiatry that "the instigators, patrons and supporters of these two subjects classify fully and demonstrably as criminals." (JCA-108). Although Scientology claims to be "open to people of all religions" (JCA-109), Hubbard asserted that heaven has been deserted for at least 43 trillion years (JCA-110), and that Christ is simply a fabrication (JCA-111).

48. The techniques of Dianetics and Scientology induce uncritical euphoria and heighten suggestibility. Scientologists are forbidden criticism of Hubbard, his organizations, his techniques, and of other Scientologists except in written reports to those organizations (JCA-112, JCA-113). Such "ethics reports" are encouraged. To even attempt to discuss the processing techniques is termed "verbal tech[nology]" and forbidden (JCA-114). Offenders are subjected to a "Committee of Evidence", a Scientology tribunal, for the commission of a "Suppressive Act" or "High Crime". Such "High Crimes" are considered the equivalent of murder (JCA-115).

49. During the first stages of involvement, a new recruit is often flattered as an exceptional individual (JCA-52) and encouraged by false claims of physical cure (e.g., JCA-21, JCA-23 to JCA-30) and psychic abilities (e.g., JCA-69, JCA-70) made in Hubbard's works and by euphoric Scientologists.

50. Scientologists are bombarded with promotional literature, magazines such as Impact, Source, Advance!, The Auditor, Communication, Certainty, Freedom, Freewinds, Good News, Inroads, Celebrity, International Scientology News and Keeping Scientology Working News. These all point to the supposedly positive and beneficial effects of Dianetics and Scientology, but avoid any mention of court decisions, medical reports, government enquiries or media pieces critical of these practices.

51. In its publications, Scientology incites hatred for anyone critical of its ideas and techniques. For example, in "Ron's Journal 34", which has frequently been reprinted, Hubbard said: "Time and again since 1950, the vested interests which pretend to run the world (for their own appetites and profit) have mounted full-scale attacks. With a running dog press and slavish government agencies the forces of evil have launched their lies and sought, by whatever means, to check and destroy Scientology. What is being decided in this arena is whether mankind has a chance to go free or be smashed and tortured as an abject subject of the power elite ... a review of these battles over the past

thirty-two years moves one to contemptuous laughter. The enemy, perched in their trees or swinging by their tails, have been about as effective as one of their psychologist's monkeys peeling a policeman's club thinking it is a banana and then throwing it only to hit the chief ape in the face ... The AMA, pouring lies into the press through gnashing teeth persevered for years - and then went bankrupt. The psychiatrist, riding high in 1959, hoping to place one of his ilk in a blackmail position behind every head of state, hoping to consign any citizen at

his whim to a psychiatric Siberia, trying to preserve his right to kill and maim as a profession above the law, is today a butt of comic strips. And what of the FDA that, for fifteen years snarled and snapped at the E-Meter? One hardly hears of them today. And what of the mighty Interpol, that tool of the CIA? It was found to be a nest of war criminals hiding out from the law itself ... You do not hear much about this from the running dog press because, of course, they were the tool of the enemy in the first place. They lose because they traffic in lies. They are mad monkeys ... just remember a maxim: if the papers say it, it isn't true." (JCA-116).

52. Scientologists are discouraged from reading anything hostile to Scientology ("entheta") (JCA-117), and ordered not to communicate in any way with anyone critical of its teachings (JCA-2). This is quite obviously a form of mental imprisonment or psychological slavery.

53. Scientology advertising is based upon the principles of motivational research, and seeks to recruit people by bypassing their reasoning. This policy was clearly stated by Hubbard (JCA-54). In 1988, the Church of Scientology hired leading Public Relations firm Hill and Knowlton to make its advertising more effective (JCA-118).

Processing

54. Hubbard termed the hypnotic counselling procedures of Dianetics and Scientology "auditing" or "processing". Scientologists undertake some 27 "levels" consisting of hundreds of different processing procedures. Scientology practitioners are rarely, if ever, trained in psychology or psychotherapy.

55. Most processing is done with the subject, or "preclear", connected to a psychogalvanometer, described by Hubbard as a "'lie detector' as used by police and in psychology laboratories" (JCA-119). The subject is connected to the galvanometer by two hand held soup cans, which function as electrodes. The galvanometer measures variations in a small electric current passed through the subject. Where an individual is unwilling to be interrogated on the E-meter, the following practice forms a part of the "scriptures" of Scientology: "When the subject placed on a meter will not talk but can be made to hold the cans (or can be held while the cans are strapped to the soles or placed under the armpit, I am sorry if that sounds brutal, it isn't [sic]), it is still possible to obtain full information from the subject" (JCA-120).

56. During the course of auditing the individual is frequently asked to disclose guilty secrets or "withholds". The auditor writes these confessions down. According to the Bulletin "Miscellaneous Reports": "When an Auditor finds an Ethics Situation [in session reports] he should mark it and circle it in red after the session. The pc [preclear - subject] is not necessarily turned in ... but the Auditor should make mention of it ... If it is a serious situation that affects others, then it is the Auditor's responsibility to report it" (JCA-121). A copy of the report is sent to a Scientology Ethics department.

57. Scientologists are periodically subjected to confessional interrogations, where printed lists, sometimes numbering hundreds of questions, are asked (JCA-122). Scientologists pay \$200 per hour for these "confessionals" (JCA-32). Confessional lists are checked with the subject connected to the "E-meter" (JCA-103). Such interrogations are now generally styled "confessionals", "integrity processing" and "eligibility confessionals" but were originally styled "security checks" or "sec checks": "In the early '60s L.R.H. [Hubbard] developed the technology known as Sec Checking. As issued it was used for two purposes: as a general tool to clean up a pc's overts and withholds and as a security tool to detect out-ethics persons and security risks." (JCA-123). In "The Only Valid Security Check", details are requested concerning potential past misdeeds, including: shoplifting, theft, forgery, blackmail, smuggling, drunkenness, burglary, embezzlement, cannibalism, drug addiction, sexual practices and counterfeiting. There are also 21 questions relating to Hubbard, his wife and Scientology (JCA-122). A Scientology "Bulletin" says "The specific details of each misdeed must be gotten." (JCA-124).

58. In the "Hubbard Communications Manual of Justice", Hubbard said "Intelligence is mostly the collection of data on people ... It is basically a listening and filing action. It is done all the time about everything and everybody." (JCA-125). Hubbard also said "The main danger of Integrity Processing is not probing a person's past but failing to do so thoroughly. When you leave an Integrity Processing question 'live' and go on to the next one, you set up a nasty situation" (JCA-126); "Take up each reading question [i.e., each question which causes a reaction on the 'E-meter'], getting the what, when, where, all of every overt [transgression] ... Get specifics ... For security investigation purposes, get all the exact names, dates, addresses, phone numbers, and any other information that might be helpful..." (JCA-103).

59. Scientologists can also be subjected to "HCO Confessionals", where they are told that the information they give will not remain confidential: "The second use of Integrity Processing is as an ethics or security measure ... [it] can be done as a straight security action." (JCA-123). The same sets of questions are used in both forms of confessional: "The term 'I am not auditing you' only occurs when a Confessional is done for justice reasons. Otherwise the procedure is the same (By 'justice reasons' is meant when a person is refusing to come clean [sic]...) ... A Confessional done for justice reasons is not auditing and the data uncovered is not withheld from the proper authorities." (JCA-103).

60. In *Church of Scientology of California v. Armstrong*, Mary Sue Hubbard, former "Controller" of Scientology, admitted that she had issued Guardian's Order 161269 which orders that "processing files" - the written records of confessionals - are to be reviewed so that discreditable material in them can be used against former members (JCA-127). This despite many representations that such confessional files are confidential. In July 1977, the FBI seized many examples of such "folder culls". Former senior Scientology executives testified in the *Armstrong* case that folder culling was a common practice in Scientology (Laurel Sullivan, Nancy Dincalci, Kima Douglas - all of whom had worked with Hubbard, and Edward Walters, a former Guardian's Office intelligence operative) (JCA-128, JCA-129, JCA-130, JCA-131).

61. Any criticism of Hubbard or Scientology is attributed to the critic's guilt and fear of being found out. Hubbard asserted: "Now, get this as a technical fact, not just a hopeful idea. Every time we have investigated the background of a critic of Scientology, we have found crimes for which that person or group could be imprisoned under existing law. We do not find critics of Scientology who do not have criminal pasts. Over and over we prove this." (JCA-73).

62. Should a Scientology student question any of the tenets of Scientology, he is required to look up definitions of words in the text: "The student says he does not understand something. The Supervisor has him look earlier in the text for a misunderstood word." (JCA-132); "Whenever a person has a confused idea of something or believes there is some conflict of ideas IT IS ALWAYS TRUE THAT A MISUNDERSTOOD WORD EXISTS AT THE BOTTOM OF THAT CONFUSION." (Emphasis in original, JCA-133). No-one who disagrees with Hubbard can continue in Scientology. All practices have to be adhered to absolutely. To do otherwise is regarded as a violation of "standard technology". In this way, even factual errors in Hubbard's work remain unchanged. For example, the phrase "The 14th century psychiatrist" used in the "Policy Letter" "Sanity" (JCA-134). A "course supervisor" at the Birmingham Scientology organization spent almost 30 minutes trying to persuade me that this was not a typographical error for "19th".

63. Hubbard's "Policy Letter" "Suppressive Acts..." (JCA-115), lists over 100 actions considered "High Crimes" or "Suppressive Acts" by Scientology. The list begins with "murder", making it clear how severely Scientology views the other listed actions. These include: "Public statements against Scientology"; "Testifying hostilely before state or public inquiries"; "Continued membership in a divergent group"; "Continued adherence to a person or group pronounced a suppressive person or group"; "Delivering up the person of a Scientologist without justifiable defense or lawful protest to the demands of civil or criminal law"; "Permitting students to talk to each other ... during course hours"; "to publicly depart Scientology". For committing any of these "high crimes", a

Scientologist can be expelled and "declared Suppressive" and his Scientologist friends and family forbidden further communication with him (JCA-2).

64. In training, Scientologists are subjected to an elaborate system of "checkouts" to ensure that they have exactly "duplicated" Hubbard's teachings. These include "high crime checkouts" (JCA-135). The purpose of such "checkouts" is to bring about absolute agreement with Hubbard. Should a student fail to agree with Hubbard, he will be sent first to the "Cramming" section of the organization and then, if that fails, to the "Ethics" section. No student is permitted to continue with a course beyond a disagreement, and students who disagree are separated from other students. Continued disagreement leads to expulsion from Scientology.

65. HCO Policy Letter "Policies on Physical Healing..." explains categories of people forbidden involvement with Scientology: "a. Persons intimately connected with persons ... of known antagonism to Scientology"; "Persons who 'want to be processed to see if Scientology works' ... News reporters fall into this category"; "Persons who 'have an open mind'" (JCA-136).

66. Scientologists are forbidden medical assistance without consent from Scientology (JCA-137). All psychotherapies and meditational practices are forbidden (JCA-138).

67. Any Scientology "Clear" can be questioned to determine which of Hubbard's claimed criteria they have obtained - for example, freedom from the common cold, a near perfect memory and the ability to do a calculation in ten or fifteen seconds that would take a "normal" person 30 minutes. The claims for "Operating Thetan levels", which come after "Clear", are stranger yet. Scientology "Operating Thetans" should be asked about their ability to leave their bodies and remotely perceive events. Demonstration should be sought. Having failed to meet Hubbard's criteria, the individual will still show absolute loyalty to Hubbard.

Retribution against litigants, critics, competitors and former members

68. The Hubbard "Policy Letter" "Suppressive Acts, Suppression of Scientology and Scientologists" (JCA-115), shows how easy it is to commit "High Crimes" or "Suppressive Acts". These include "Public disavowal of Scientology", "Public statements against Scientology", "Bringing civil suit against any Scientology organization", "Demanding the return of any or all fees", "Continued adherence to a person or group pronounced a suppressive person or group", "publicly departing Scientology" and "Violation or neglect of any of the ten points of Keeping Scientology Working" (in particular "Knowing it [Scientology "technology"] is correct", "Applying the technology", "Hammering out of existence incorrect technology"). Strictly speaking, anyone who does not know that Scientology's "technology" is correct is deemed a "Suppressive Person".

69. It is made clear in Scientology's published policy that a person expelled from Scientology is "Fair Game" (JCA-139). A "Suppressive Person declare" is Scientology's equivalent of the Shia Muslim "fatwah".

70. In "Justice, Suppressive Acts, Suppression of Scientology and Scientologists, the Fair Game Law", Hubbard asserted "By FAIR GAME is meant, without rights for self, possessions or position, and no Scientologist may be brought before a Committee of Evidence or punished for any action taken against a Suppressive Person or Group during the period that person or group is 'fair game'." (JCA-140). In this Policy Letter, we learn that "Suppressive Acts include ... 1st degree murder, arson, disintegration of persons or belongings not guilty of suppressive acts". Scientologists are thereby given leave to destroy the person and property of a "Suppressive Person".

71. Elsewhere, Hubbard carefully explained the provisions of Fair Game: A Suppressive Person "May be deprived of property or injured by any means by any Scientologist without any discipline of the Scientologist. May be tricked, sued or lied to or destroyed." (JCA-141)

72. In 1968, Hubbard ordered that the words "Fair Game" "may not appear on any Ethics Order. It causes bad public relations." However, the practice of Fair Game was not cancelled. "This ... does not cancel any policy on the treatment or handling of an SP [Suppressive Person]" (JCA-142).

73. A training checklist used as evidence in the conviction of eleven Scientology officials in the US (including Hubbard's wife and immediate deputy), shows that the 1 March 1965 "Policy Letter" (JCA-140) still formed part of a secret course for Scientology harassment operatives (members of "Branch One" of the "Guardian's Office" of Scientology) (JCA-143, p.18, second item).

74. When the nominal head of Scientology's "Guardian's Office", Jane Kember, and the head of Scientology Intelligence, Morris Budlong, were sentenced to imprisonment in the United States, in 1980, the sentencing memorandum included this statement: "Defendants, through one of their attorneys, have stated that the fair game policy continued in effect well after the indictment in this case and the conviction of the first nine co-defendants. Defendants claim that the policy was abrogated by the Church's Board of Directors in late July or early August, 1980." (JCA-144, footnote p.16).

75. The "Policy Letter" which allegedly cancelled "fair game" in 1980 (JCA-139), was itself cancelled by a Policy Letter of 8 September 1983 (JCA-145). As such, Fair Game is an incontrovertible "scripture" of the Churches of Scientology (JCA-46, JCA-47, JCA-48), even though the words "fair game" are no longer used to describe the practice (JCA-142).

76. Mr. Justice Lately ruled in the High Court in London, in July 1984, that "Deprivation of property, injury by any means, trickery, suing, lying or destruction have been pursued throughout and to this day with the fullest possible vigour ... The 'Church' resorts to lies and deceit whenever it thinks it will profit it to do so." (JCA-146).

77. In *Wollersheim v. Church of Scientology of California* (the "mother church" of the Churches of Scientology at the time the suit was filed), the California Appeal Court ruled, in a decision upheld by the US Supreme Court: "Wollersheim was compelled to abandon his wife and his family through the policy of disconnect. When his mental illness reached such a level he actively planned his suicide, he was forbidden to seek professional help. Finally, when Wollersheim was able to leave the Church, it subjected him to financial ruin through its policy of 'fair game'." (JCA-147, pp A-7, 15 & 16). At appeal, Scientology asserted that "fair game" was a "core practice of Scientology", and therefore protected as "religious expression". This position was also made on behalf of Scientology in the case against Gerald Armstrong, in 1984, by religious expert Dr. Frank Flinn (JCA-45).

78. In the same case (*Church of Scientology of California v. Armstrong*) (JCA-7), Judge Paul Breckenridge criticised the continued use of Fair Game, showing that the policy had remained in force beyond the supposed cancellation in 1980. Judge Breckenridge said: "In addition to violating and abusing its own members' civil rights, the [Scientology] organization over the years with its 'Fair Game' doctrine has harassed and abused those persons not in the Church whom it perceives as its enemies." Judge Breckenridge added, "After the within suit was filed ... Defendant Armstrong was the subject of harassment, including being followed and surveilled by individuals who admitted employment by Plaintiff; being assaulted by one of these individuals, being struck bodily by a car driven by one of these individuals; having two attempts made by said individuals apparently to involve Defendant Armstrong in a freeway automobile accident; having said individuals come onto Defendant Armstrong's property, spy in his windows, create disturbances, and upset his neighbors".

79. Fair Game has long been a policy of Scientology. In 1955 Hubbard wrote, speaking of practitioners of Scientology not licensed by him: "The law can be used very easily to harass ... if possible, of course, ruin him utterly" (JCA-27, p.157). Hubbard also wrote, "If attacked on some vulnerable point by anyone or anything or any organization, always find or manufacture enough threat against them to cause them to sue for peace." (JCA-148).

80 In 1965, Hubbard wrote in Scientology's "Auditor" magazine: "Principals of the Victorian government such as the 'Prime Minister', Anderson the 'Q.C.' and hostile members of the 'Victorian Parliament' are continued as suppressive persons and they and their families and connections may not be processed or trained and are fair game" (JCA-149)

81. Current Scientology "scriptures" attribute only negative qualities to "Suppressive Persons" (JCA-150) Between 1983 and 1992, the number of people adjudged "Suppressive Persons" by Scientology increased from 600 (JCA-1) to 2,400 (JCA-151). According to Scientology leader David Miscavige, the next section of Hubbard's supposed psychotherapy - Operating Thetan Course Section 9 - will not be released until "ethics is fully gotten in on the SPs [Suppressive Persons]" (JCA-152). This means that all critics of Scientology must be silenced. In light of the "scripture" of "Fair Game", the interpretation of this order to all Scientologists can only be alarming.

82. The lengths to which Scientologists will go to harass opponents are shown by a Hubbard lecture, still distributed within Scientology, where Hubbard boasted of the creation of his intelligence agency the "Guardian's Office", and its infiltration of newspapers, international banks and even the British government: "With all of this action being taken against us in the last 17 years ... it was vitally necessary that I isolate who it was on this planet who was attacking us ... The Organization, under the direction of Mary Sue [Hubbard], ... employed several professional intelligence agents who had long and successful professional backgrounds and they looked into this matter for us and the results of their activities - although still in progress - have told us all we needed to know with regard to any enemy we had on this planet. Our enemies on this planet are less than 12 men. They are members of the Bank of England, and other higher financial circles. They own and control newspaper chains and they are oddly enough directors in all the Mental Health groups in the world ... Wilson ... the current premier of England [sic] is totally involved with these fellows ... They have collected rather interesting files on us ... and their orders concerning what to do about this as part of their files all makes very interesting reading. We of course have full copies of their files. It was, of course, their bad luck to tangle with someone who had been trained in the field of intelligence by the allied governments, which is myself and they had insufficient security and insufficient loyalty amongst their own people to keep out the intelligence agents which we sent against them." (JCA-153).

83. Ten years after Hubbard initiated the practice of infiltration and theft, Churches of Scientology in the US were raided. This led to the conviction and imprisonment of eleven Scientology officials (JCA-154). Almost forty others were cited as "unindicted co-conspirators", including Hubbard (JCA-155). Similar events led to convictions in Canada in 1992.

84 The sentencing memorandum in USA v. Mary Sue Hubbard et al makes clear the scale of the offences committed by Hubbard's agents: "The United States initiated the investigation which resulted in the instant indictment in view of the brazen, systematic and persistent burglaries of United States Government offices in Washington, D.C., and Los Angeles, California, over an extended period of at least some two years. Additionally, the United States was confronted with the pervasive conduct of the defendants in this case in thwarting a federal Grand Jury investigation by harboring a fugitive, in effect forcefully kidnapping a witness who had decided to surrender to the federal authorities, submitting false evidence to the Grand Jury, destroying other evidence which might have been of valuable aid to its investigation, preparing a cover-up story, and encouraging and drilling a crucial witness to give false testimony under oath to that Grand Jury ... a review of the documents seized in the ... searches ... show the incredible and sweeping nature of the criminal conduct of the defendants and of the organization which they led. These crimes include infiltration and theft of documents from a number of prominent private national and world organizations, law firms and newspapers, the execution of smear campaigns and baseless law suits to destroy private individuals who had attempted to exercise their First Amendment rights to freedom of expression; the framing of private citizens who had been critical of Scientology, including the forging of documents which led to the indictment of at least one innocent person; violation of the

civil rights of prominent private figures and public officials. These are but a few of the criminal acts not covered in the 'uncontested' stipulation of evidence ... defendant Heldt's assertion that 'the policy of the Church prohibits any illegality on the part of its members or staff...' is totally unfounded and incorrect. The evidence in this case ... establish[es] beyond peradventure that the Church and its leadership had, over the years, approved, condoned and engaged in gross and widespread illegality. One, indeed, wonders how it can even be suggested that the defendants and their organization did not make illegal activities part and parcel of their daily work " (JCA-154).

Scientology's attitude towards the Courts

85. The scriptures of Scientology show little respect for the judicial system. In 1965, Hubbard wrote "Don't react to Scientology Ethics as though it were 'wog' law. In society's 'courts' one is given the works and truth has little bearing on the findings. A mean judge or clever attorney and small legal errors decide a lot of their cases. Wog courts are like throwing dice. There is huge cost and publicity and punishment galore even for the innocent." (JCA-156). In another 1965 "Policy Letter", Hubbard said "Want to know why wog courts make people nervy? Who can predict a wog court decision? Who can even predict the sentence man to man for the same crime?" (JCA-157).

86. The second edition of What is Scientology? contains a section comparing "Scientology justice" to "wog law", which says that the "justice system is bogged down in a morass of Latinized grammatical complexities and has become, sadly, a matter of which attorney can present the better argument. Right and wrong, guilt and innocence are relegated to bit players in the show. A lawyer defending a criminal on trial for armed robbery, for instance, is not interested in establishing guilt or innocence; he is looking for a loophole or technicality on which the case can be dismissed and his client set free whether guilty or not. Few have the wealth necessary or even try to pursue justice through the courts and even if one prevails, attorney costs often make it a Pyrrhic victory. The due process of the court system is in a virtual gridlock of motions, countermotions, depositions, injunctions, appeals, claims and counterclaims." (JCA-158).

87. In a statement recusing himself from a Scientology case, California judge James Ideman said "The past eight years have consisted mainly of a prolonged, and ultimately unsuccessful, attempt to persuade or compel the plaintiff to comply with lawful discovery. These efforts have been fiercely resisted by plaintiffs. They have utilized every device that we on the District Court have ever heard of to avoid such compliance, and some that are new to us. This noncompliance has consisted of evasions, misrepresentations, broken promises and lies, but ultimately with refusal. As part of this scheme to not comply, the plaintiffs have undertaken a massive campaign of filing every conceivable motion (and some inconceivable) to disguise the true issue in these pretrial proceedings. Apparently viewing litigation as war, plaintiffs by this tactic have had the effect of massively increasing the costs to the other parties, and, for a while, to the Court ... The scope of the plaintiffs' efforts have to be seen to be believed ... 1,737 filings [were made by Scientology] ... Yet it is almost all puffery -- motions without merit or substance." (JCA-159).

88. In the "scriptures" of Scientology, Hubbard wrote: "the law can be used very easily to harass." The December 1980 issue of "The American Lawyer" makes it clear that this policy has extended to judges in trials involving Scientology (JCA-160).

89. As part of their membership contract, Scientologists are compelled to sign the "Pledge to Mankind", first issued in 1984, which reads in part "In the United States ... we are the targets of unprincipled attacks in the court system by those who would line their pockets from our hard won coffers. Bigots in all branches of government ... are bent on our destruction through taxation and repressive legislation. We have been subjected to illegal heresy trials in two countries before prejudiced and malinformed judges who are not qualified or inclined to perceive the truth." (JCA-161).

90. A 1985 issue of the Scientology magazine "Impact" carries the following account. "Rev. Ken Hoden ... President of the Church of Scientology of California recently won a motion in Los Angeles that allowed the Church to rebring an important Federal lawsuit. After one of the Church attorneys was arrested on the charge of contempt of court and another escorted out of the Courtrooms by order of a suppressive Judge ... Rev. Hoden got up. He argued before the judge for a full twenty minutes. He had effectively picked up the ball and gave a most moving, pro-Church and anti-suppression speech, right to the face of the suppression. the judge in the case" (JCA-162)

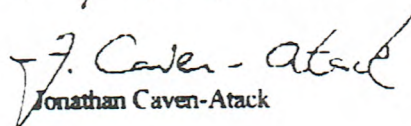
Counselling

91. Since 1983, I have counselled tens of former Scientologists and been appalled by a succession of accounts of financial and psychological devastation. I have met individuals who borrowed money under false pretences, bankrupted businesses to pay immense amounts for Scientology "auditing", and abandoned spouses and even small children to pursue Scientology. I have also counselled individuals who had left Scientology as much as 20 years before and who had been plagued by guilt and a sense of inadequacy induced by Scientology and its techniques of psychological domination. Scientology is especially dangerous to those with incipient mental illness. I have counselled two individuals who were first committed to mental hospitals after encountering Scientology and been consulted by the staff of a psychiatric hospital in a third case. A California Appeal Court judgment, upheld by the US Supreme Court, shows that Scientology brought about manic depression and suicidal tendencies in former member Lawrence Wollersheim (JCA-147, p.A-2).

92. The promises of Dianetics and Scientology are so attractive, the counselling procedures so invasive and the selling techniques so forceful that former members can take years to see them as simply techniques of psychological domination. U.S. academics Conway and Siegelman, who studied 400 former cult members from 48 groups, concluded that Scientology has "the most debilitating set of rituals of any cult in America ... although claiming the most severe long-term effects, former Scientologists surveyed reported the lowest total of hours per week spent in ritual and indoctrination." Conway and Siegelman approximated the time for unaided recovery at 12.5 years (JCA-163). My own experiences as a counsellor bear this out.

I declare under the penalty of perjury under the laws of the United States of America and the United Kingdom that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Radcliffe-on-Trent, England, this 9th day of April, 1995,


Jonathan Caven-Attack

THE TOTAL FREEDOM TRAP

Scientology, Dianetics
and L. Ron Hubbard

by Jon Atack

**This booklet is dedicated to the memory of
Khushroo Motivala**

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First edition, one printing, August 1992.

Second edition October 1992: (better artwork was
substituted, minor changes made to the text, and extra
'further reading' suggestions made in the last page).

First printing (USA) October 1992
Second printing (UK) December 1992
Third printing (UK) January 1993

Proceeds from this booklet go toward further research
into Scientology and other manipulative systems.

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Published by Theta Communications Ltd., Avalon,
Cranston Rd., East Grinstead, W. Sussex, RH19 3HQ,
England.

Printed by Peter Forde, Underwood Court, Hyde,
Cheshire. England

SCIENTOLOGY, DIANETICS
and L. RON HUBBARD
**THE TOTAL FREEDOM
TRAP**

"Scientology is a religious philosophy in its highest meaning as it brings man to Total Freedom."

—L. Ron Hubbard, *Religious Philosophy and Religious Practice*, 21 June 1960, revised 18 April 1967.

"An endless *freedom from* is a perfect trap, a fear of all things ... Fixed on too many barriers, man yearns to be free. But launched into total freedom he is purposeless and miserable."

—L. Ron Hubbard, *The Reason Why*, 15 May 1956.

The work of L. Ron Hubbard has been surrounded by controversy since he first announced his "modern science of mental health" in 1950. His followers assert that he is not only the reincarnation of Buddha but also Maitreya, who according to Buddhist legend will lead the world to enlightenment.

To Scientologists, L. Ron Hubbard is quite simply the wisest, the most compassionate and the most perceptive human being ever to draw breath.

Yet, Hubbard was dubbed "schizophrenic and paranoid" by a California Superior Court judge, and Scientology dismissed as "immoral and socially obnoxious" by a High Court judge in London. Scientologists have been convicted of criminal offences in Canada, the USA, Denmark and Italy.

An enormous amount of documented evidence demonstrates that Hubbard was not what he claimed to be, and that his subject does not confer the benefits claimed for it.

The Church of Scientology is an enormously wealthy, global organization, with over 270 churches and missions. Using profoundly invasive hypnotic techniques, Scientology has managed to inspire the at times fanatical devotion of tens of thousands of previously normal and intelligent people.

INVOLVEMENT

Most people come to Scientology when their lives are in crisis. Scientology uses manipulative recruiting techniques to heighten vulnerability, and falsely promises a solution for almost any problem. From the beginning, the new recruit is subjected to techniques which induce euphoria. The desire for this euphoric state can be likened to a drug addiction, often rendering members all but incapable of critical thinking with regard to Scientology.

The Church of Scientology very rapidly comes to dominate the member, prohibiting contact with anyone hostile to the movement, and insisting that a huge conspiracy exists which is intent upon destroying Scientology. The mark of a fanatic is the inability to even consider evidence. Unfortunately most Scientologists simply close their eyes and ears to criticism.

L. RON HUBBARD

"The evidence portrays a man who has been virtually a pathological liar when it comes to his history, background and achievements. The writings and documents in evidence additionally reflect his egoism, greed, avarice, lust for power, and vindictiveness and aggressiveness against persons perceived by him to be disloyal or hostile."

—California Superior Court Judge Breckenridge, speaking of L. Ron Hubbard, in a 1984 decision.

Lafayette Ronald Hubbard, creator of Dianetics and Scientology, was born in the United States, in 1911. Hubbard claimed he could ride before he could walk, and that he was riding broncos at the age of three-and-a-half, by which time he could also allegedly read and write.

He also claimed to have been a bloodbrother of the Blackfoot Indians by the age of four. However, the Blackfoot Indians dismiss "bloodbrothers" as a Hollywood fantasy, and there is no more truth in Hubbard's other boasts. His early life was undistinguished, and one childhood friend recalls that Hubbard was actually afraid of horses. Hubbard asserted that his grandfather was a wealthy cattle-baron. Factually, Lafayette Waterbury was a small town veterinarian, who ran a series of failing businesses.

Hubbard said that his interest in the human mind was sparked by a meeting with Commander Thompson, a U.S. Navy doctor, when he was twelve. However, Hubbard's extensive teenage diaries—used as evidence in a California court case—show no interest in psychological or philosophical ideas.

Hubbard told his followers that he spent five years—between the ages of fourteen and nineteen—travelling alone in China, Mongolia, India and Tibet, and studying with holy men. He did not actually visit Mongolia, India nor Tibet. His two visits to China were short excursions in the company of his mother. Hubbard confessed the brevity of his Chinese stay in an interview with *Adventure* magazine in 1935.

Hubbard was nineteen when he entered George Washington University, where he intended to major in Civil Engineering. He failed to qualify for the third year of the course, because his grades were too low. It would later be claimed that Hubbard had degrees in both civil engineering and mathematics. He graduated in neither, and his grades in mathematics were very poor. While at University, Hubbard also failed a short course in

"molecular and atomic physics", which prompted his ludicrous assertion that he was "one of America's first Nuclear Physicists".

EXPEDITIONS

During his last semester at University, Hubbard arranged the "Caribbean Motion Picture Expedition". It was later asserted that this expedition provided "invaluable data" to the University of Michigan and the Hydrographic Office, neither of which have any record of it. In fact, the trip was announced in the University newspaper under the heading "L. Ron Hubbard Heads Movie Cruise Among Old American Piratical Haunts".

In the event, the expedition reached only three of its sixteen proposed ports of call, failing to take any film. In a 1950 interview, Hubbard dismissed it as "a two-bit expedition and a financial bust".

Hubbard's second supposed expedition was described by him as the "first complete mineralogical survey" of Puerto Rico. Again, there are no records of such a survey, because Hubbard seems to have spent most of his time in Puerto Rico prospecting unsuccessfully for gold. He worked briefly as a civil engineer's assistant before returning to the U.S.

In February 1940, Hubbard talked his way into membership of the Explorers' Club of New York, and was awarded an expedition flag for his proposed "Alaskan Radio Experimental Expedition". Hubbard was trying out a new system of radio navigation, and used the "expedition" to beg equipment to refit his 32-foot ketch, the *Magician*. Claims made by the Scientologists that the expedition was commissioned by the U.S. government are unfounded.

Writing to the *Seattle Star* in November 1940, Hubbard complained that the "expedition" had been hindered by repeated failures of the *Magician's* engine. Hubbard and his first wife spent most of their time stranded in Ketchikan, Alaska, while he tried to write enough stories to pay for costly engine repairs. Eventually, he used borrowed money to leave Alaska—money he failed to repay.

PULP FICTION

The Scientologists have claimed that upon leaving college Hubbard "went straight into the world of fiction writing and before two months were over had established himself in that field at a pay level which, for those times, was astronomical".

Factually, it took Hubbard several years to make even a precarious living from his writing. He wrote under such stirring pen names as Rene Lafayette, Tom Esterbrook, Kurt von Rachen, Captain B.A. Northrup, and Winchester Remington Colt. Under the name Legionnaire 148, Hubbard concocted "true" stories about his supposed exploits in the French Foreign Legion, but mainly he churned out adventure stories for the cheap "pulp" magazines.

He contributed to many such magazines, including *Thrilling Adventures*, *The Phantom Detective* and *Smashing Novels Magazine*, eventually turning to science-fiction and writing chiefly for *Astounding Science Fiction*. His pulp stories include "The Carnival of Death", "King of the Gunmen" and "Man-Killers of the Air". By the time he created Dianetics, in 1950, he was writing imaginative, if rather unstylish, science-fiction, and exploring ideas which he would later incorporate into Scientology.

THE WAR YEARS

Hubbard's eyesight had prevented his admission to the U.S. Naval Academy, prior to his enrollment at University. In 1941, he was accepted into the Navy Reserve after receiving a waiver for his inadequate vision.

Many outlandish claims were made by Hubbard about his achievements while in the U.S. Navy. For instance, he bragged that he had been the first returned casualty from the Far East. In fact, he was shipped to Australia in December 1941, and he sufficiently antagonised his superiors to be returned to the U.S. after only a few months. After his return, in March 1942, Hubbard was posted as a mail censor in New York.

The Scientologists have boasted that Hubbard "rose to command a squadron". Factually, he oversaw the refitting of two small vessels in U.S. harbours. His second such command was withdrawn after a cruise down the west coast. During the course of this journey, Hubbard managed to in-

volve a number of craft in a 55-hour battle against what he believed to be two Japanese submarines. The incident was reviewed by Admiral Fletcher who pronounced "an analysis of all reports convinces me that there was no submarine in the area ... The Commanding Officers of all ships except the PC-815 [commanded by Hubbard] state they had no evidence of a submarine and do not think a submarine was in the area."

Hubbard completed this "shakedown cruise" by firing on a fortunately uninhabited Mexican island. He was removed from command, and Rear Admiral Braisted wrote in a fitness report, "Consider this officer lacking in the essential qualities of judgment, leadership and cooperation. He acts without forethought as to probable results ... Not considered qualified for command or promotion at this time. Recommend duty on a large vessel where he can be properly supervised."

The advice was followed, and Hubbard served briefly as a navigation officer aboard the USS Algol, before its departure from U.S. waters. Hubbard was one of hundreds of officers transferred to the School of Military Government on the campus of Princeton University. This was to lead to Hubbard's later and completely false boast to have graduated from Princeton. In a more candid moment, Hubbard said that he "flunked" his overseas examination.

WAR WOUNDS

At different times, anywhere from 21 to 27 medals have been claimed for Hubbard, including a Purple Heart, awarded only to those wounded in combat. Not only was Hubbard not wounded, but apart from his imaginary submarine battle, he never saw combat. He received four routine service medals for his duty in Australia and the U.S.

In an article called "My Philosophy", Hubbard claimed to have been "blinded with injured optic nerves, and lame with physical injuries to hip and back, at the end of World War II ... My Service record stated ... 'permanently disabled physically'." Elsewhere, Hubbard said that a few days before the end of the war, he managed to get the better of three petty officers in a fight in Hollywood.

In contradictory accounts, Hubbard claimed to have spent either one or two years at Oak Knoll Naval Hospital, developing Dianetics and curing his injuries through its use. The origin of Dianetics is obscured by conflicting

Scientology accounts, which variously assert that his recovery came in 1944, 1947 or 1949.

Factually, Hubbard spent the last months of the war largely as an outpatient at Oakland Naval Hospital. His chief complaint was an ulcer, though between his admission to hospital and his separation from the Navy his eyesight deteriorated markedly. This visual deterioration became part of his pension claim to the Veterans Administration.

SEX MAGICK

With his separation from the Navy, Hubbard abandoned his first wife and their two young children to take up the practice of "Magick". Hubbard had experienced a peculiar hallucination in 1938, while under nitrous oxide during a dental operation. He believed that he had died during the operation and while dead been shown a great wealth of knowledge. Upon his recovery, he wrote a book called *Excalibur*, but was unable to find a publisher.

Hubbard's interest in the occult also led to a brief membership in a Rosicrucian group. He told a friend that he believed himself protected by a guardian spirit whom he called "the Empress", and he was to repeat this claim to one of his followers many years later. In 1945, Hubbard took up with Jack Parsons, head of the Pasadena lodge of Aleister Crowley's *Ordo Templi Orientis*.

Crowley styled himself "the Beast 666", servant of the Antichrist, and advocated the use of addictive drugs and bizarre sexual practices. Jack Parsons was a chemist and an early member of Jet Propulsion Laboratory in California, but his passion was Magick (as Crowley respelled the word). Hubbard and Parsons performed sexual ceremonies to summon a woman willing to become the mother of "Babalon", the incarnation of evil.

The affair ended with Hubbard running off not only with Parsons' girl, Sara, but also with his money. Hubbard married Sara Northrup bigamously, and started to write pathetic letters applying for a war pension. In October 1947, when according to later accounts he had "cured" himself through Dianetics, Hubbard admitted to suicidal tendencies and begged for psychiatric help in a letter to the Veterans Administration.

Hubbard continued to perform black magic rituals and started to use self-hypnosis, confiding to his notebook such hypnotic affirmations as "all men

are my slaves". His personal papers also make it clear that he was deliberately pretending war-related ailments so that he could claim a pension increase.

By this time, Hubbard was already addicted to the barbiturate drugs originally prescribed for his ulcer. His drug use continued during his Scientology career, even though he was to sponsor the Scientology anti-drug group *Narconon*. Although Dianetics claims to overcome compulsions with ease, Hubbard was unable to kick the tobacco habit, and chain-smoked over 80 cigarettes a day.

DIANETICS

"Hypnotism was used for research, then abandoned."

— L. Ron Hubbard, *Dianetics: the Modern Science of Mental Health*.

Hubbard gave stage demonstrations of hypnosis in 1948, and wrote to his literary agent about a new project with many selling "angles". Marrying hypnotic technique to research long abandoned by Freud, Hubbard came up with Dianetics. In 1950, he modified the hypnotic technique without further "research" to write the book *Dianetics: the Modern Science of Mental Health*.

In a 1909 lecture, Freud explained a method for uncovering traumatic memories. Patients were asked to recall earlier and earlier life incidents on a "chain" until the emotional "charge" was released. Hubbard not only took the technique, he even retained several of the expressions used by the translator of these lectures. Freud had abandoned the technique, because it was laborious and completely failed to uncover key repressions. In fact, after sometimes providing initial relief, Dianetics all too often deteriorates into the dangerous conviction that entirely imaginary incidents are literal truth.

Hubbard took Freud's technique, added a little of the then-popular General Semantics, and asserted that the "basic" or original traumatic incidents had occurred in the womb. In this he was following the work of Otto Rank, Nandor Fodor and J. Sadger. Hubbard also asserted that it was actually possible to recall prenatal incidents, right back to conception (the "sperm dream"). Fodor too had written of prenatal memory.

Hubbard redefined the existing term "engram" as a label for traumatic incidents where the individual has lost consciousness. *Dianetics: the Modern Science of Mental Health* proclaims that by "erasing" these engrams, the individual is freed from compulsions, obsessions, neuroses, and such conditions as heart trouble, poor eyesight, asthma, colour blindness, allergies, stuttering, poor hearing, sinusitis, high blood pressure, dermatitis, migraine, ulcers, arthritis, morning sickness, the common cold, conjunctivitis, alcoholism and tuberculosis. Hubbard soon claimed cures for cancer and leukaemia.

No scientific evidence for these claims has ever been produced.

Once the first engram (or "basic-basic") has been erased, the individual is supposedly "Clear", free from all deficiencies, and possessed of a high IQ. After repeated challenges, Hubbard eventually put a Clear on show in August 1950, at the Shrine Auditorium, in Los Angeles. Despite Hubbard's claims that a Clear would have "a near perfect memory", the woman, a Physics major, was unable to remember a basic physics formula. She could not even recall the colour of Hubbard's tie when his back was turned.

Dianetics sold 150,000 copies before being withdrawn from sale by its publisher. The American Psychological Association cautioned would-be Dianeticists that no scientific evidence for the many claims made in *Dianetics* had been forthcoming. There can be no doubt that Hubbard had invented both cases and statistics to write the book.

Hubbard's following diminished as people realized that his claims were grossly exaggerated, and with the collapse of the first Dianetic Foundations and Hubbard's second marriage. Sara Hubbard charged that her husband had tortured her with sleep deprivation, drugs and physical attacks. She claimed that he had once strangled her until the eustachian tube to her left ear ruptured, leaving her hearing impaired. Hubbard fled to Cuba, after seizing their baby daughter, in what proved to be a successful attempt to silence Sara.

With the backing of millionaire Don Purcell, Hubbard was able to return to the United States, where Sara accepted a divorce settlement. She withdrew her earlier claims, in return for their infant daughter, whom she had not seen for several months.

The new Wichita Foundation soon ran into trouble, and Hubbard abandoned it to its creditors, accusing Don Purcell—who had earlier saved

him—of accepting \$500,000 from the American Medical Association to ruin him. This was far from the last display of paranoia on Hubbard's part.

SCIENTOLOGY

"We've got some new ways to make slaves here."

—L. Ron Hubbard, Philadelphia Doctorate Course lecture 20, 1952.

February 1952 found Hubbard penniless, and stripped of both the rights to Dianetics and most of his following. One of his associates stole the mailing lists of the Wichita Foundation, and Hubbard started to send out ridiculous attacks upon the Foundation and increasingly pathetic requests for money.

He also gave the Hubbard College lectures to a tiny audience, and within six weeks had created a new subject apparently out of thin air. He was later to admit his admiration for Aleister Crowley ("my very good friend"), and in fact the fundamentals of Scientology have much in common with Crowley's "magickal" ideas—mixed in with a large helping of science fiction.

With Scientology, Hubbard asserted that we are all spiritual beings ("theta-beings", and later "thetans"), who have lived for *trillions* of years, incarnating again and again. He claimed that through the use of his new techniques, anyone could achieve supernatural powers. In 40 years, no scientific evidence has been provided for these claims.

During the Hubbard College lectures, Hubbard also introduced the Electrometer, or E-meter, designed by Dianeticist Volney Mathison. The E-meter is actually a lie detector, closely related to the machine used in police polygraphs in the U.S.

In *Dianetics: the Modern Science of Mental Health*, Hubbard claimed "Dianetics cures, and cures without failure". Two years later, he dismissed these earlier techniques as "slow and mediocre". He now claimed that with Scientology, "the blind again see, the lame walk, the ill recover, the insane become sane and the sane become saner".

MENTAL SCIENCE BECOMES RELIGION

"I'd like to start a religion. That's where the money is."

—L. Ron Hubbard to Lloyd Eshbach, in 1949; quoted by Eshbach in *Over My Shoulder*.

In several conversations in the late 1940s, Hubbard had assured listeners that the best way to get rich was to start a religion. By the time of his death, in 1986, it is alleged that Hubbard had amassed a personal fortune of over \$640 million through Scientology (despite claims that he didn't even take a royalty from his books).

In April 1953, Hubbard wrote to one of his deputies asking what she thought of "the religion angle". Later that year, he incorporated the Church of Scientology, which was licensed by his Church of American Science. The incorporation was kept secret, so that Hubbard could distance himself from it.

It was only in the late 1960s, with increasing criticism of its methods by western governments, that Scientology retreated behind the trappings of religion. Scientology "ministers" take a course in comparative religion based upon a single book, and read the few ceremonies written by Hubbard. Their training takes a few days. They dress in imitation of Christian ministers, including a dog collar and a Christian-seeming cross. In fact, the cross is a Scientology cross, which clearly imitates that of Hubbard's role model, magician Aleister Crowley. It is actually a satanic "crossed out" cross.

THE PERSONALITY TEST

Scientology recruits most of its followers from the street by offering a free personality test. The Oxford Capacity Analysis (OCA) was written by a Scientologist who was a former merchant seaman, with no psychological training. It has no connection with Oxford University, and derives ultimately from the Johnson Temperament Analysis Profile.

The current 200 question test provides Scientology with detailed personal information. In the past, the Church of Scientology has proved more than willing to use supposedly confidential information against former members.

In 1991, a letter to Scientology recruiters offered a course teaching "how to tell people the results of their OCA so that they will reach for Scientology". Another internal document says that the Test Evaluator "is to point out to the person by means of a personality test evaluation what is ruining his life, and to show him how Scientology can save him from that ruin ... when you point out a low score ... say 'Scientology can handle that'." The test is designed to ensure that very few people have an acceptable personality profile.

Scientology sales staff ("registrars") are extensively trained and drilled in hard-selling techniques. The first stage of recruitment is to focus the person's attention on the most distressing areas of his or her life (the "ruin"). Hypnotherapists might call this an "emotional induction". Any intense emotion tends to overwhelm critical thinking. The coolness of rational thinking is distinct from the heat of the emotions. The recruiter then plays upon the person's fear that the condition will worsen. Then the "solution" of Scientology is offered.

Whatever the problem is, the immediate solution will almost always be a Communication Course, and indoctrination into Hubbard's ideas about "Suppressive Persons".

TECHNIQUES

"Scientology is evil; its techniques evil; its practice a serious threat to the community, medically, morally and socially."

—Report of the Board of Inquiry into Scientology for the state of Victoria, Australia, 1965.

While the basic ideas of Scientology had nearly all been expressed by the end of 1952, Hubbard continued to pour out new techniques that were "guaranteed" to cure all human ills. He borrowed from many forms of therapy and meditation to create an elaborate "Bridge" which he claimed led to "total freedom".

Scientology indoctrination usually begins with the Communication Course Training Routines or "TRs". These are supposed to enhance the ability to communicate, but have been called by one expert "the most overt form of hypnosis used by any destructive cult".

In the first TR, two people sit silently facing each other, with their eyes closed. In the second, they stare at each other, sometimes for hours on end, inducing hallucinations and an uncritical euphoria.

In the next stage, TR-0 Bullbait, the student has to sit motionless, while the "coach" does everything possible to disturb him or her. The student progresses to reading aloud disconnected phrases from *Alice in Wonderland*, and then to acknowledging statements read out at random from the same text. Then comes TR-3, where the student repeatedly asks the coach either "Do fish swim?" or "Do birds fly?". In the last "Communication Course" Training Routine, the student again asks one of these questions repeatedly, learning not to be distracted by anything the coach says or does.

Repetition is another way of inducing an altered or trance state. Following these procedures definitely makes the individual more susceptible to direction from Scientology.

From the Communication Course, the new recruit will usually go onto the "Purification Rundown", after a meeting with a Scientology salesperson, who convinces the recruit that the Rundown is well worth the high price demanded for it. Those on the "Purification Rundown" take extremely high doses of vitamins and minerals, and combine running and sauna treatment for five hours each day. Such high doses of vitamins can create various physiological reactions, including drug-like experiences. Hubbard attributed these reactions to stored drugs and pollutants being removed from the body. He even made the ridiculous claim that LSD lodges in fatty tissue. As LSD is both highly unstable and water soluble, this is impossible, but it shows Hubbard's usual scientific ignorance. The heat exhaustion brought on by the sauna can lead to euphoric experiences, yet again weakening critical thinking.

The sequence of steps on the Scientology Bridge has changed from one year to the next. After the "Purification Rundown"—and another interview with a salesperson—the recruit might well go on to the "Hubbard Key to Life Course" (at a cost of £4,000 or \$8,000). This supposedly undercuts all previous education by returning the individual to the basics of literacy. Factually, because it treats all clients as pre-school children, it tends to cause age regression, making people yet more susceptible to Scientology.

From the "Hubbard Key to Life Course," the individual moves on to the "Hubbard Life Orientation Course" and thence to the "Objective Processes."

There are several hundred Scientology counselling procedures or “auditing processes”. The “Objectives” were first introduced in the 1950s. Hubbard asserted that it is necessary to show the individual that reactive impulses can be controlled by being put under the control of another person (the Scientology “auditor”). This might be more simply termed “mind control”. On the Objective Processes, the individual is given strict orders to repeat an overwhelmingly tedious cycle of behaviour.

In “Opening Procedure by Duplication”, for example, the auditor and the client or “pre-clear” are alone in a room with a table at either end. On one table is a book, on the other a bottle. The preclear will be instructed, with unvarying wording, to look at the object at the other side of the room, to walk over to it, to pick it up and to identify its colour, weight and temperature. Sessions often run to two hours, and cases of 18 such sessions for this single “process” are not unheard of. Eventually, this arduous ritual leads to a sensation of floating, believed to be “exteriorization from the body” in Scientology—but a common side effect of hypnotic trance.

The Scientology Bridge is laid out in a series of steps, or grades, each with a purported result. On Grade Zero, for example, clients are meant to achieve the ability to “communicate freely with anyone on any subject”. A Grade One “release” is supposedly without problems.

In 1959, Hubbard introduced “security checking”, where Scientologists are interrogated, having to answer long, prepared lists of questions about their moral transgressions. The E-meter is used as a lie detector throughout these “sessions”. A careful record is kept of all confessions, and this has proved to be a highly effective means of silencing dissidents.

This procedure, renamed “integrity processing”, using exactly the same lists of questions as the earlier “security checks”, finds a place on Grade Two, and is frequently repeated beyond it (at a cost ranging from £130 to £260, or \$250 to \$500, per *hour*). Scientology presumes that *any* of its members might become a security risk at any time. There is justification for this suspicion, as thousands have left the movement, including many leading lights.

There are two further release grades, before the “preclear” starts on the current form of Dianetic auditing. In New Era Dianetics, the preclear is asked to re-experience incidents from “past lives”, which can lead to strange delusions on the part of Scientologists, compensating for the shortcomings of their real lives. Through Dianetics, preclears are supposed at last to be-

come Clear, with the realization that they no longer need their "Reactive minds", where engrams are supposedly stored.

Once "Clear", they are ready for the Advanced Courses of Scientology, the "Operating Thetan" or "OT" levels.

THE SECRET LEVELS

In 1952, Hubbard claimed that after Scientology auditing and indoctrination anyone would become "capable of dismissing illness and aberration from others at will". Scientologists have undertaken hundreds, and sometimes thousands, of hours chasing this illusion and Hubbard's often-repeated promises of supernatural abilities. In the late 1960s, Hubbard released his Operating Thetan levels. An Operating Thetan is an individual supposedly capable of "operating" without need of a body, and Hubbard made many sugared claims for his extremely expensive OT levels.

The OT levels are kept secret by the Church of Scientology; however, the contents of most have long since been public knowledge. The first OT level consists of a series of drills, such as walking along the street counting people until one feels euphoric and has some sort of "realization". In 1992, "OT section 1" was listed at £1,000 or \$2,200.

On the second level (costing £2,000 or \$4,200) the "pre-OT" battles with seemingly endless lists of phrases and their contradictions ("I must exist" and "I mustn't exist", for example), often having to imagine seeing a light and feeling a shock at each phrase. At least one victim endured 600 hours of this mind-numbing ritual.

The pre-OT parts with a "minimum donation" of £3,400 or \$7,200 to traverse the OT 3 "wall of fire". On OT 3, the recipient is assured that 75 million years ago the Earth was part of a Galactic Confederation ruled by an evil prince called Xenu. The Confederation suffered from massive overpopulation, so Xenu devised a scheme whereby the peoples of some 76 planets were shipped to earth and annihilated. The spirits or thetans of these victims were exploded, by putting H-bombs in volcanoes, and gathered on "electronic ribbons". Then they were "implanted" for 36 days with images of the future societies of Earth. According to Hubbard, all cultures and religions since derive from these hypnotic implants. He said, for example, that Christ is an illusion implanted at this time.

After implanting, the thetans were packaged together in clusters, and, according to OT 3, everyone alive is a mass of such clusters. The levels from OT 4 to 7 also deal entirely with these clusters and the "body thetans" which make them up. Anyone hearing of this material will supposedly become ill and die within days. However, towards the end of his life, Hubbard wanted to release the story (certainly one of his best) as a movie, to be called "Revolt in the Stars".

The contents of OT 8, released after Hubbard's death, and the highest level so far available, have been shrouded in secrecy. OT 8 is only available aboard Scientology's cruise ship, the *Freewinds*, after extensive Security Checking has ensured unquestioning dedication to Hubbard and his teachings. One former member asserts that the level deals with the individual's relationship to the divine. Rather than addressing the deity through prayer, however, the Scientologist is asked to remember times in former incarnations when he or she encountered God. The individual is then to remember what problems were solved by believing in God (the "prior confusion" which made them vulnerable to belief). In this way, belief in God is undermined.

On OT 8, Scientologists are allegedly taught that they exist in parallel universes, and are told to disconnect from their parallel selves. Finally, the Scientologist is to re-experience moments of his or her own creation, and discover any abandoned aspects of the self. This supposedly leads to a major realization about God. Former members who have suffered through this nonsense assert that the desired realization is that Hubbard created all the living beings in the universe. A leaked OT 8 Bulletin, which may or may not be genuine, claims that Hubbard is in fact the antichrist.

ETHICS

Hubbard stepped up his control over his followers in the mid-1960s with the introduction of various so called "ethics" procedures. Anyone who criticises Hubbard or Scientology is labelled a "Suppressive Person", "SP" or "anti-social personality".

Scientologists who associate with anyone deemed an SP are termed "Potential Trouble Sources", and forbidden further auditing or training. Indeed, Scientologists can be ordered to cease communication with, or "disconnect" from, anyone considered unfriendly by the Church of Scientology.

"Disconnection" is virtually identical to the "shunning" practised by certain extreme fundamentalist groups.

Hubbard also introduced "ethics conditions" at this time, and gave "formulas" which are supposed to elevate one's ethical state. In the 1960s, Scientology staff put into "lower conditions" were deprived of sleep (often for several days), prevented from washing or shaving, forced to wear a black mark on one cheek, a chain or a dirty rag around the arm, and confined day and night to organization premises.

Hubbard put to sea with his closest followers in 1967. Aboard ship, anyone who displeased him was confined to the chain locker. Here the victim would crouch in bilge water and excrement in total darkness, surrounded by rats, sometimes for as much as two weeks without respite. Even children were put into the chain locker on Hubbard's order. In 1968, the chain locker punishment was supplemented by "overboarding", where people, even non-swimmers, were hurled from the decks into the sea.

In 1973, Hubbard replaced these cruel and unusual practices with a new and profoundly effective form of humiliation—the Rehabilitation Project Force, or RPF. The RPF is still in use in Scientology organizations throughout the world. Those who fail to comply with orders, make mistakes or simply fall short of their production quotas are put onto the RPF. RPFers can only speak when spoken to, they are meant to eat table scraps, sleep even shorter hours than other staff, and comply immediately and unquestioningly with any order. They work a full day, doing physical labour, and are then expected to spend five hours confessing and hearing the confession of their RPF partner.

Only when they completely accept the authority of their superiors are they allowed to leave the RPF. Taming an individual in this way can take up to two years.

HARASSMENT—THE GUARDIAN'S OFFICE

"Our organizations are friendly. They are only here to help you."

—L. Ron Hubbard, 'Dianetic Contract', 23 May 1969.

Through the 1950s, Hubbard advocated ever-stricter measures to deal with critics and defectors. Hubbard's Church has always campaigned actively against anyone who uses Scientology techniques without following orders and paying tithes. Speaking of a hypothetical splinter group in 1955, Hubbard wrote, "if you discovered that some group calling itself 'precept processing' had set up ... in your area, you would do all you could to make things interesting for them ... The law can be used very easily to harass, and enough harassment ... will generally be sufficient to cause his [sic] professional decease. If possible, of course, ruin him utterly."

In 1958, Hubbard institutionalised intelligence gathering in his secret *Manual of Justice*, which says, "Intelligence is mostly the collection of data on people ... It is done all the time about everything and everybody." This was the prelude to the creation of Scientology's secret police force and intelligence agency, the Guardian's Office. An "ethics file" is kept on every Scientologist. It contains every embarrassing admission made during counselling, write ups of transgressions and "knowledge reports".

All Scientologists are expected to report even the slightest criticism made by their fellow Scientologists about Hubbard, his organization or his teachings. A Scientologist who fails to make such a report is subject to the same penalties as the original critic. This policy is based upon that used by the Nazis, turning everyone into an informer, loyal only to Scientology.

After the introduction of "Ethics" policies in 1965, many people left Scientology to join a splinter group called Amprinistics. An enraged Hubbard wrote, "Harass these persons in any possible way", and urged that their meetings be broken up.

The large amounts of money demanded by Hubbard, and the severe treatment meted out to his followers, inevitably led to public concern. Enforced "disconnection" has torn many families apart. Scientology was castigated by a government inquiry in Victoria, Australia, in December 1965. In February the following year, Lord Balniel requested that the British parliament launch an Inquiry. Hubbard responded by setting up the Guardian's Office, and reinforcing his policy of "noisy investigation" into anyone who criticised Scientology. As Hubbard said, "The DEFENSE of anything is

UNTENABLE. The only way to defend anything is to ATTACK." The Guardian's Office attacked without pause.

The Guardian's Office (GO) existed to promote Scientology, to attack critics, and to keep members in line. The GO acted as an intelligence agency, infiltrating newspapers, psychiatric hospitals and even government agencies; and as an internal police force, silencing defectors. Very few former Scientologists have spoken out against the organization, knowing that every detail of their lives is kept in their Scientology "ethics files". There is much irrefutable evidence that these files have been used against former members. The Guardian's Office grew into a daunting force with 1,100 staff by 1982.

In a secret directive, Hubbard wrote, "we will successfully bring the following *facts* into public consciousness ... People who attack Scientology are criminals ... if one attacks Scientology he gets investigated for crimes ... If one does not attack Scientology ... one is safe."

The Intelligence or Information Bureau of the Guardian's Office, or GO, was modelled on Nazi spy master Gehlen's system. GO agents stole medical files, sent out anonymous smear letters, framed critics for criminal acts, blackmailed, bugged and burgled opponents, and infiltrated government offices stealing thousands of files (including Interpol files on terrorism, and files on the interchange of intelligence material between the U.S. and Canada). Critics were to be driven to breakdown or harassed into silence.

Eventually, in the early 1980s, eleven GO officials were imprisoned in the US, including Hubbard's wife, Mary Sue, and her deputy, the Guardian, Jane Kember. In July 1992, the Church of Scientology and three Scientologists were found guilty of criminal acts in Canada. Ten years before this conviction, the Office of Special Affairs had replaced the Guardian's Office.

The secret mission of both the Guardian's Office and its successor has been the discovery and elimination of the conspiracy which Hubbard believed was operating against him. At various times, Hubbard blamed Russian communism, neo-fascism, bankers, psychiatrists, the Internal Revenue Service and Christian priests for negative reports concerning Scientology.

His paranoid imagination saw enemies everywhere. As with all psychopaths, Hubbard was incapable of admitting error. He was oblivious to the anti-social nature of the practices which quite rightly provoke criticism of Scientology.

THE SEA ORGANIZATION

Having been asked to leave Rhodesia in 1966, and fearing British government action (he was later banned from entry), Hubbard fled to Las Palmas and created the Sea Organization. For eight years, from 1967 to 1975, Hubbard and his retinue (numbering several hundred) plied the Mediterranean and the Atlantic in a flotilla of unseaworthy vessels. The incompetence of the crews led to many accidents.

Sea Organization members were put into pseudo-naval uniform, adopted naval ranks and signed a *billion* year contract to serve "command intention". The management of Scientology became a paramilitary organization, under the direction of "Commodore" L. Ron Hubbard. All "Sea Org" members are expected to receive martial arts and weapons training. One executive was later to boast publicly that management was "tough" and "ruthless". Compassion is virtually unheard of in Hubbard's voluminous teachings. Sea Org members work long hours (usually devoting over 90 hours per week to Scientology), for derisory pay. They often spend weeks or months restricted to a diet consisting entirely of rice, beans and porridge. Discipline is harsh, the withdrawal of pay and proper food preceding banishment from sleeping quarters (when staff are assigned to "pig's berthing").

Sea Org members have restricted access to their children, usually only being allowed to see them for an hour or two each week. Children are kept in the "Cadet Org," with the specified intention of making them into Sea Org members. Indeed, Sea Org children can start working for the organization by the age of twelve, sometimes securing high positions before their fifteenth birthdays. Children as young as eight have acted as auditors, taking the confessions of adults.

FRONT GROUPS

In 1966, Hubbard wrote, "Remember, CHURCHES ARE LOOKED UPON AS REFORM GROUPS. Therefore we must act like a reform group." Since that time, tens of front groups have come into being, some to enhance the public repute of Scientology, others to recruit new members.

The World Institute of Scientology Enterprises (WISE) licenses Scientologists to use Hubbard material in their business training programmes. WISE members offer such programmes with no indication that the material they use is Scientology. In the U.S., Sterling Management has been criticised for selling expensive courses to health professionals, who are then recruited into Scientology. The Association for Better Living and Education (ABLE) sponsors "reform" groups such as *Criminon* (which indoctrinates prison inmates into Scientology), the *Concerned Businessmen's Association*, *Cry Out!* (which cashes in on concern for the environment), *Applied Scholastics* (which trains people in Hubbard's "Study Technology") and *Narconon*.

NARCONON

Narconon was started by convict and drug addict William Benitez, in the mid-1960s. It claims to be a rehabilitation programme for alcoholics and other drug addicts, and at different times and in different places has briefly won state support (withdrawn when the close association of Narconon to Scientology is revealed, or when the inadequacy of Narconon's methods is demonstrated). Narconon works alongside Scientology's "Say No to Drugs Campaign", and is advocated by Scientologist and former cocaine addict, Kirstie Alley.

For several years, Narconon has tried to establish a large centre on the Chilocco Indian reservation in Oklahoma. In December 1991, the Oklahoma Mental Health Board denied certification to this centre, ruling that "there is no credible scientific evidence that the Narconon program is effective". The program was also judged "unsafe". The Board complained that not only was medical supervision inadequate, but that graduates of the program were immediately taken on as staff. In Narconon, alcoholics and other addicts are not educated about substance abuse, but are simply put through the program. The Board also complained that "the Narconon treat-

ment plan is general in nature, applies categorically to all students and is not individualized." The Board reported that Narconon did no follow up studies (which, of course, dismisses any claim to the program's efficacy), and had inadequate discharge planning. There was also particular concern that Narconon clients, including alcoholics, are told that if they are not able to drink after the program, then the program is simply not complete.

Hubbard's "Purification Rundown" is at the heart of the Narconon Program. The Purification Rundown supposedly rids the body of drug residues through massive doses of vitamins, and five hours a day of running and sweating in a sauna. The Oklahoma Mental Health Board complained of inadequate control of sauna temperature, and warned of the potential dangers, particularly to heroin addicts, of sauna use.

The Board had no doubt that "Narconon employs staff inadequately educated and trained in the care and treatment of drug and alcohol abuse clients"; and was shocked to find that "Narconon permits clients under treatment for drug and alcohol abuse to handle and provide medications to fellow Narconon clients, to supervise the sauna treatment of fellow Narconon clients, and to supervise clients with psychiatric disorders." No mental health professionals are employed by Narconon.

The doses of vitamins are so high on the Purification Rundown that they become potentially dangerous (several vitamins are poisonous in high doses; and vitamin B1 can have a disorienting effect similar to that of certain drugs). The Oklahoma Mental Health Board was especially concerned about the use of vitamin B3 in the form of niacin, which in large doses has been connected with liver failure. "Large doses of niacin are administered to patients during the Narconon program to rid the body of radiation. There is no credible scientific evidence that niacin in any way gets radiation out of the patient's body. Rather, the more credible medical evidence supports the existence of potential medical risks to persons receiving high doses of niacin".

In a surprise move, in August 1992, the Oklahoma Board of Mental Health granted Narconon exemption from state certification, without withdrawing its earlier criticisms.

SCIENTOLOGY AND RELIGION

"Reference was made to some unusual features of membership ... and to the strong commercial emphasis ... Regardless of whether the members ... are gullible or misled or whether the practices of Scientology are harmful or objectionable, the evidence ... establishes that Scientology must, for relevant purposes, be accepted as 'a religion' in Victoria."

—Australian court ruling.

Hubbard claimed that Scientology is non-denominational and does not clash with any religion. The claim is preposterous. In his secret writings, Hubbard asserted that Christ is a fabrication, an implanted hypnotic suggestion. Yoga, and therefore Hinduism, he dismissed as "booby-trapped". In one interview, he said that his favourite book was *Twelve Against the Gods*, where author William Bolitho called Mahomet a psychopath. Of course, the doctrine of reincarnation which is essential to Scientology, is unacceptable to Judaism, Islam or Christianity.

Hubbard claimed that Scientology is "twentieth century Buddhism". However, the essential doctrine of "anatta" or "no soul" is completely denied in Scientology, which believes in an immortal and imperishable ego or "thetan". Further, Hubbard dismissed Buddhism through his statement that "No culture in the history of the world, save the thoroughly depraved and expiring ones, has failed to affirm the existence of a Supreme Being."

Scientology contradicts the teachings of all of the major religions by propounding that great wealth is a virtue, a measure of spiritual success. Hubbard divided the "urges to survive" into eight "dynamics". These are survival as or through self, family and procreation, groups, mankind, life forms, the material, the spiritual and infinity or the Supreme Being. Hubbard claimed that to make a sensible decision, it was only necessary to determine the effect upon these "dynamics", and choose the route which benefited the greatest number. No special place is given to the eighth dynamic, or God, in this scheme, so it is possible for a decision to be taken because it advantages the majority of the other seven dynamics. This practice is unconscionable to all who believe in God.

Hubbard also dismissed the notion of compassion. Scientologists believe that everything that happens to an individual is self-generated, so the unfortunate are called "victims", who have "pulled in" their misfortune. Sym-

pathy is frowned upon, and considered to be a "lower" emotional reaction than fear or anger. All transactions must receive a proper "exchange", so Scientologists do not tend to work for, or donate to, charities (other than their own front groups). As Hubbard put it, "When you let a person give nothing for something you are factually encouraging crime". Scientology induces contempt for all non-Scientologists, who are called "wogs" or "raw meat".

MANIPULATION

"When somebody enrolls, consider he or she has joined up for the duration of the universe - never permit an 'open-minded' approach ... If they enrolled, they're aboard, and if they're aboard, they're here on the same terms as the rest of us - win or die in the attempt. Never let them be half-minded about being Scientologists ... When Mrs. Pattycake comes to us to be taught, turn that wandering doubt in her eye into a fixed, dedicated glare ... The proper instruction attitude is '... We'd rather have you dead than incapable.'"

— L. Ron Hubbard, *Keeping Scientology Working*, 7 February 1965, reissued 27 August 1980.

Hubbard claimed to have studied hypnosis from his teens onwards. At the outset, he admitted that his Dianetic "research" was done using deep trance hypnosis. In the early days, he also admitted that the Dianetic procedure could be trance inducing. The term "hypnosis" has aroused much controversy. Probably the most exacting conceptual framework was made by hypnotherapist Milton Erickson, who asserted that hypnosis is an interaction between people which accesses altered states of consciousness.

Contemporary psychology accepts that most mental processes occur below consciousness. A hypnotherapist accesses the unconscious in an attempt to place beneficial suggestions therein which will have the same motivating force upon the individual as his or her own decisions. In hypnotherapy, the client gives permission for this process to occur. In Scientology, the process occurs without consent.

Hubbard asserted that everything that exists is a product of consciousness: "Reality is agreement", "the universe is an agreed upon apparency". From

this perspective, Scientology seeks to change the individual's perception of reality, and replace it with Hubbard's notions, at the same time pretending that the individual is becoming more aware, and more "self-determined". Scientology claims to be scientific, but factually, it is impossible to undertake "auditing" without submitting to beliefs which have not been scientifically validated, such as reincarnation, possession by spirits (or body thetans) and the existence and influence of "engrams".

Restrictions are put upon Scientologists to prevent them reaching a critical understanding of Scientology. Explanation of Hubbard's work is forbidden; the materials must be quoted exactly. Dissent from the materials is also forbidden—the Scientologist's "realizations" in counselling must align with Hubbard's pronouncements about the nature of reality. Any disagreement with Hubbard or his teachings will lead the individual to the "Ethics Office", a department of Scientology's internal police force.

The Scientologist may not talk about his "case" or problems other than to his or her auditor, thus inhibiting close relationships. The "technology" of Scientology is and always has been right (even when Hubbard changed it every few months), and failure to achieve spectacular success (i.e., euphoric states) is always considered to be the fault of either the auditor or the preclear, never of the techniques. Scientologists are led to believe that criticism (unless made by Hubbard) always stems from guilt about one's own transgressions. The individual's attention is focused inwards and so deflected from consideration of Hubbard's or Scientology's faults.

Scientology procedures are comparable with those of hypnotherapy. In Training Routine 0, two people are supposed to sit looking at each other "for some hours". Visual fixation has long been accepted as a means of inducing altered or trance states. Repetition is another method of induction, and Hubbard admitted that a number of his procedures are mind-numbingly monotonous. It is possible in Scientology to sit for several hours answering the same single line question, the wording never varied, such as "From where could you communicate to a victim?"

Eventually, the individual's entire perception and belief system is over-ridden by Scientology. The Scientologist may not talk about the Operating Thetan levels, so is separated from most of humanity, believing malevolent spirits to be the real cause of all disability and conflict. Scientologists do not accept any other perception of reality than Hubbard's. Hubbard derided hypnotherapy, psychology, analysis, meditation and religious counselling, claiming that Scientology is the *only* effective system.

Staff members, especially those in the Sea Organization, become even more suggestible through long working hours, sleep deprivation, poor diet and regular doses of the Rehabilitation Project Force.

HARD SELLING

"Advanced Courses [in Scientology] are the most valuable service on the planet. Life insurance, houses, cars, stocks, bonds, college savings, all are transitory and impermanent ... There is nothing to compare with Advanced Courses. They are infinitely valuable and transcend time itself."

—L. Ron Hubbard speaking of his "Operating Thetan Courses", Flag Mission Order 375.

Hard selling techniques are another aspect of the use of undue influence or destructive persuasion upon members. Clients of Scientology are harassed with demands for ever increasing "donations" for auditing and indoctrination. Completion of the Scientology "Bridge" costs in the region of £200,000 or \$350,000 (there are Scientologists who have paid even more). Many Scientologists have found themselves homeless and deeply in debt as a result of high pressure selling. Sales interviews can last for as much as 13 hours, and depend upon the sophisticated manipulation techniques described in Les Dane's *Big League Sales Closing Techniques*.

Another alarming aspect of Scientology's greed is the sale of Hubbard artefacts, called "Special Properties"—limited editions of Hubbard books and anything signed by Hubbard. These artefacts are pushed onto Scientologists with the insistence that they are highly marketable commodities with great investment potential. In reality, they are virtually worthless outside the confines of the Scientology world.

Outrageous amounts are charged for these items. One former member was induced to spend some £26,000 (of which £10,000 was borrowed), with promises that the value of these "Special Properties" would rocket. Despite making extensive enquiries over a seven year period, the "Special Properties" have proved unsaleable at anything like the price originally charged. The former member purchased a single, signed photograph of Hubbard for over £8,000. This is not an isolated case: one Scientologist spent an incredible £90,000 on "Special Properties".

The Scientology organization pours out advertising material, ranging from simple leaflets to full-blown television campaigns. Although Hubbard was highly critical of psychology, he was perfectly willing to use the techniques of motivational research. Careful surveys determine key words, symbols and colours to which potential customers will react, without critical thought. Hubbard bragged about the manipulative effect of these techniques.

Scientologists are expected to pay out thousands towards courses, and then have to purchase ridiculously expensive books, course packs, E-meters, and tapes of Hubbard lectures as a prerequisite to taking each course. The tapes generally sell for about £30 each, and Hubbard gave *thousands* of lectures. Every Scientologist is expected to buy at least two E-meters, ranging from £700 to £2,750 *each*. The components from which an E-meter is constructed make up only a fraction of this cost.

SCIENTOLOGY LIES

“Handling truth is a touchy business ... Tell an *acceptable* truth.”
—L. Ron Hubbard, *The Missing Ingredient*, 13 August 1970.

Scientology claims over 7 million members internationally, yet an internal membership report for 1987 showed only 40,000. There are also often repeated claims that Hubbard books have sold millions of copies. In fact, Hubbard books have been “hyped” onto best seller lists through carefully orchestrated campaigns. Scientology has probably managed to sell more copies of Hubbard’s books than have been printed, by buying back and reselling. One book store even received a consignment which already had its own price labels on.

LITIGATION & FAIR GAME

In the 1960s and 70s, Scientology became notorious for its willingness to litigate. Such litigation was rarely successful, but made the media hesitant to report on Scientology, and caused many critics to withdraw. The pace of litigation slowed considerably with the decline of the Guardian's Office. Only major opponents are now sued. However, litigation against Scientology has increased. It has been reported that at the beginning of 1992, Scientology faced over 700 suits.

In his 1984 ruling in the California Superior Court, Judge Breckenridge stated, "In addition to violating and abusing its own members civil rights, the organization over the years with its 'Fair Game' doctrine has harassed and abused those persons not in the Church whom it perceives as enemies."

In the Fair Game law, Hubbard asserted that those adjudged Suppressive by Scientology "May be deprived of property or injured by any means ... may be tricked, sued or lied to or destroyed". The continuing use of Fair Game was also established in a London child custody case in 1984, and in a California Appeal Court judgment in 1989.

In this last decision, in the case of Larry Wollersheim versus the Church of Scientology of California, the court upheld Wollersheim's allegation that he had been subjected to Fair Game. Further, the judge ruled:

"...the Church's conduct was manifestly outrageous. Using its position as his religious leader, the Church and its agents coerced Wollersheim into continuing 'auditing' although his sanity was repeatedly threatened by the practice ... Wollersheim was compelled to abandon his wife and family through the policy of disconnect. When his mental illness reached such a level he actively planned his suicide, he was forbidden to seek professional help."

In July 1992, the Church of Scientology was found guilty of infiltrating the Toronto, Ontario and Royal Canadian Mounted Police, along with the offices of Revenue Canada, the Ontario Attorney General and the state government.

Thousands of files had been stolen by Hubbard's espionage network.

THE DESTRUCTIVE EFFECTS OF SCIENTOLOGY

As the Wollersheim case demonstrated, Scientology "auditing" can have a profoundly destructive effect. After a survey of 48 groups, Conway and Siegelman reported that former Scientologists had the highest rate of violent outbursts, hallucinations, sexual dysfunction and suicidal tendencies. They estimated that full recovery from Scientology *averaged* at 12.5 years.

Members are entirely saturated with Hubbard's delusional and unscientific view of the universe. They come to see themselves as part of a small elite, harassed on all sides by a gigantic conspiracy. Scientologists speak and think in an elaborate language created by Hubbard (Scientology dictionaries run to over 1,000 pages of definitions). They are drilled to present a calm, cheerful appearance, whatever their real feelings. Most become "auditing junkies", unable to face life without regular "sessions". All aspects of the individual's life are invaded, as Hubbard held forth on almost every subject from business management to child rearing.

Scientology induces a phobic reaction towards mental health practitioners, so ex-members are usually unwilling to seek professional help in untangling themselves. This situation is compounded by the inability of most mental health practitioners to understand the cult experience. So most former Scientologists drift into other cult groups, or derivatives of Scientology such as est (the Forum or Landmark), Avatar, Dianasis, Re-Evaluation Co-Counselling, or Idenics.

Mental Health practitioners who have had contact with former Scientologists have diagnosed their condition as Post-Traumatic Stress Disorder. One psychiatrist has asserted that Hubbard reversed therapies used to reduce obsession, so creating obsessive disorders. Former members report a high incidence of Chronic Fatigue Disorder—a lack of motivation and energy. However, as yet no research has been undertaken to confirm these reports.

GOVERNMENT ACTION

In June 1992, the Church of Scientology was found guilty of criminal activity by a Canadian jury. Membership in Germany's leading political party is now denied to Scientologists, because of the policy of infiltration. Scientology is under investigation in France and Spain. In February 1992, the European Council endorsed a recommendation that the member nations of the EEC should fund information groups to educate the public about New Religious Movements. As yet no action has been taken.

HELP FOR MEMBERS

If a friend or relation becomes involved with Scientology, it is important not to attack their decision. A friendly, sympathetic attitude and a willingness to listen are very important. Showing the person material hostile to Scientology will generally only reinforce their infatuation, and make them more defensive and less willing to communicate.

Be honest but not aggressive with your concerns about Scientology.

Allow the person to talk without interruption about the benefits they feel they have received. In fact, allowing the person to talk is crucial, because the need to articulate ideas often clarifies thinking.

Don't try to do their thinking for them. Don't interrupt or make sniping comments.

In a friendly environment, they will discover for themselves some of the contradictions inherent in Scientology. If prompted to look for such contradictions they may simply stop listening. When you are sure that the person does not feel threatened, ask if they are willing to look at material critical of Scientology, rather than just presenting them with the material.

Kidnap deprogramming is both morally offensive and illegal. It is also largely unsuccessful in Scientology cases. There are, however, a few consultants who will not resort to kidnapping and have a sufficient awareness of Scientology to be able to help members reconsider their involvement in a non-coercive environment.

FURTHER INFORMATION

Jon Atack, the author of this booklet, was a client of Scientology from 1974 to 1983. Since his resignation from the Church of Scientology, he has consulted to many leading newspapers and magazines, including the *Sunday Times*, *Forbes* magazine, *Time*, the *Los Angeles Times* and the *Reader's Digest*. In 1987, he was the main consultant to BBC TV's *Panorama* documentary. He has also consulted to TVS, Central TV, Granada TV, CBC, NBC, CBS and ABC.

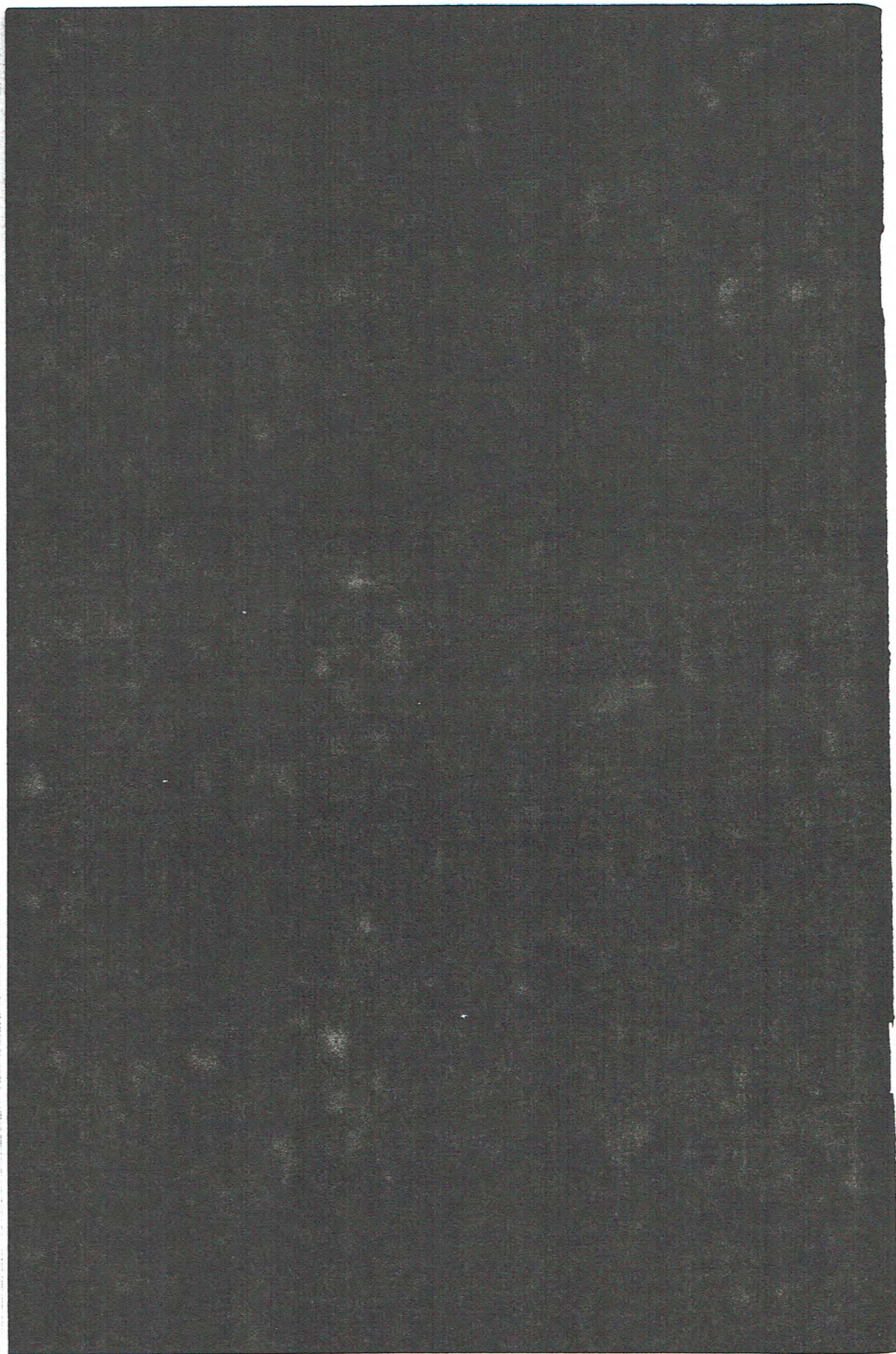
Jon Atack's book, *A Piece of Blue Sky* (ISBN 0-8184-0499-X), is published by Lyle Stuart Books in the USA, and by Musson Book Company in Canada. *A Piece of Blue Sky* is a 400-page history of Hubbard, his organizations and his techniques. It is available in Europe direct from the author at Avalon, Cranston Rd, East Grinstead, West Sussex, RH19 3HG, England.

For a better understanding of Scientology beliefs and techniques, see Hubbard's *Volunteer Minister's Handbook* (ISBN 0-88404-039-9).

For a better understanding of the manipulative nature of Scientology, see Steven Hassan's *Combatting Cult Mind Control* (ISBN 0-89281-243-5) and Thomas and Jacqueline Keisers' *The Anatomy of Illusion* (ISBN 0-398-05295-6).

Margery Wakefield's *The Road to Xenu* is an excellent first-hand account of membership, and includes Bob Penny's thought provoking *Social Control in Scientology*. *The Road to Xenu* is available via P.O. Box 290402, Tampa, Florida 33687.

EXHIBIT B



A PUBLIC WARNING



JON ATACK

Published by: Theta Communications International,
U.S.A.

JON ATTACK ANATOMY OF A PROPAGANDIST

A PUBLIC WARNING!

INTRODUCTION

Anatomy defn: "a detailed analysis"

Propagandist defn: "a person who spreads selected information to propagate an idea"

Jon Attack likes to call himself a "critic" of Scientology. More accurately he should be described as a propagandist, since he only selects information to impart that is designed to paint the blackest possible picture of the subject. He is a black propagandist. He also tries to make this his profession - a point which should never be forgotten. His technique is very simple: collect together everything that anyone has ever said against the Church, ignore everything positive; select out of the tens of thousands of pages of Scientology material a few issues and quotes which can be taken out of context, misinterpreted and used to suggest something negative, and ignore the balance which shows these in their true positive light.

This booklet is primarily about Jon Attack, the man, and what motivates him. Everything stated in this booklet has been researched from non-confidential sources, and is well documented. The only reason it has been written is so that people can view what he says in a proper context. Jon Attack took the Church to Court in an attempt to stop disclosing the facts about him contained in this booklet. He claimed that if his "clients" knew the truth about him no one would hire him. He lost that case and had to pay the Church over 16,000 pounds in costs, and that truth can now be told.

As those who have been exposed to it can tell you, Attack's technique is superficially clever, an exercise in sophistry¹. He works on saturating his prey with negative ideas and distortions. He uses highly selective documents to support his half truths and innuendoes.

Here are a few examples of the truth which he does not tell people:

* Attack does not mention, or tries to discount the fact, that on 1st October 1993 all Scientology Churches and related organizations in the United States were recognized by the Internal Revenue Service as charitable and tax-exempt. The reason that he does not mention this is that he knows that this recognition

1. Sophistry: Specious but fallacious argument, esp. one intended to deceive or mislead.

followed an exhaustive review over a number of years of all Churches and Church related organizations, not just in the United States but right around the world. This was in fact the biggest investigation ever carried out in the IRS's history, and involved the inspection of millions of pages of documents. They investigated virtually every allegation ever made against the Church by anyone, including the many allegations recycled for use by Attack, and in the end pronounced themselves satisfied that there was nothing in any of them. Their determinations included that:

(1) Scientology is a bona fide religion;

(2) the Churches of Scientology and their related charitable and educational institutions are operated exclusively for recognized religious purposes;

(3) Churches of Scientology and their related charitable and educational institutions operate for the benefit of the public interest rather than for the interests of private individuals; and

(4) no part of the net earnings of Churches of Scientology and their related charitable and educational institutions enure to the benefit of any individual or non-charitable entity. The reality is a far cry from the picture that Attack tries to paint.

* Attack does not mention that a number of the sources for his most scurrilous allegations about the Church and the Founder of Scientology, L. Ron Hubbard, subsequently retracted what they had said as either untrue or grossly exaggerated, or were completely discredited, before Attack even picked up their allegations and recycled them. One key source, Gerry Armstrong, who temporarily misappropriated a large number of L. Ron Hubbard's personal papers a few years ago, later bragged on tape about his ability to forge Church documents.

* Attack does not mention that he has had no first hand experience inside a Church of Scientology for more than 10 years. At the start of the 1980s a number of staff were expelled for unethical activities and a serious failure to follow Church policy. Attack tries to paint a picture of the Church based on the former activities and allegations of those who were expelled.

* Attack, in attempting to denigrate L. Ron Hubbard,

completely ignores the vast numbers of acknowledgements and awards L. Ron Hubbard has received from State Governors, Mayors and many different bodies around the world for his achievements in many fields. One area of L. Ron Hubbard's life which Attack commonly tries to belittle is his war record in World War II. Attack knows, but neglects to mention, that there are a number of apparently contradictory records including medical records. This has been explained by Col. L. Fletcher Prouty, who was Chief of Special Operations for the US Joint Chiefs of Staff between 1955 and 1963, as follows:

"Almost all of Hubbard's military record is replete with markings that signify deep intelligence service at the highest levels. Many of his records, copies of official records, revealed that even the originals had been fabricated in the manner peculiar to the intelligence community in a process that we call "Sheep Dip". [This] is a process that provides, customarily, three files. One is the true civilian record of the agent. One is his agency or military true record. The third is his 'cover' personality and all that it takes to support it."

In fact L. Ron Hubbard's official and true Notice of Separation from the US Naval Service was noted by Col. Prouty to include medals from different theatres of war and included a Purple Heart (Palm), which signified that he had been wounded in action on at least two occasions. Also of note was a "Unit Citation", which is a rare award only made by the President of the United States to those combat units performing particularly meritorious service.

* It might also be mentioned that Attack's obsessive criticism of L. Ron Hubbard's life should be considered along with a parallel review of Attack's own life:

By the age of 16, Mr. Hubbard had experienced broad travel — including places such as Hawaii, Japan, China, the Philippines, Hong Kong and Guam, where he taught in a native school. At the same age, Attack, who had lived in Lichfield, England all his life, was already being warned by his psychiatrist that he was foolish to take LSD. (A "mind-drug" which causes hallucinations and can cause temporary or permanent insanity.)

Mr. Hubbard went on to become a best selling author in many genres, with a writing career spanning over 50 years. His written and spoken words on Scientology alone cover over 40,000,000 words. His book, Dianetics: The Modern Science of Mental Health, has sold over 16 million copies. Attack, has had one book published which has sold a total of about 3,000 copies.

Mr. Hubbard worked hard all his life and his contributions to

society in many fields have been recognized by academics, politicians, artists — and ordinary people — all over the world. To select merely one example, Dr. David Rodier, Ph.D., Associate Professor of Philosophy at American University, Washington, DC., describes Mr. Hubbard's book The New Grammar by saying, "Only a professional writer with a writer's sensitivity to language could have written such an innovative approach to grammar.... This is a brilliant book by a brilliant mind. In fact, it is a revolution in thought." Attack, on the other hand, has been unemployed practically his whole life and has made no known contribution to society.

So why does Attack want to give people a false and distorted picture of the Church? Read on...



MENTAL INSTABILITY

Attack was born in Lichfield, Staffordshire in June 1955. By the age of 13, after having run away from home, he was seeing a psychiatrist, Dr. Hazel Baker, every two to four weeks. These consultations lasted for more than four years. On 11th November 1974, Attack committed himself for two days into St. Matthew's Mental Hospital, Brentwood, Staffordshire, where he was prescribed sedatives and antidepressant drugs. In December 1974 Attack was taking cocaine, Tuinal, and marijuana. In late December he tried to overdose on the drug sodium amytal. He also stated at the time that he was suffering from persecution from his brothers and that "he had no close friends".

Such was the state of Attack's life when he first encountered Scientology. Yet, just 10 months later, he wrote:

"I've completed a play for TV last week, which I've been struggling with for two years. I'm in higher affinity with those around me, communicate freely, feel causative. I feel confident as a writer. Dianetics and Scientology have given me larger gains than anything else this lifetime."

Attack made many such statements throughout the years he spent with the Church, yet nothing like this is ever mentioned in his subsequent writings about Scientology. However, it is a fact that he remained free from drugs and apparently free from mental instability throughout the years he was with the Church. In truth, Scientology had saved Attack's life.

However, since Attack's departure from the Church, the observable conditions of his life have suffered. For example, in late 1993 his wife Noella stated that he had threatened to commit suicide if she were to leave him and she would therefore be responsible for his death. This threat cowed her at the time into remaining with him despite serious misgivings about their marriage.

Attack has a history of blaming others for his mental problems. In one instance he blamed his self-institutionalization on the fact that a girlfriend, Karen Joyce, was sleeping with a friend of his and moving to New Zealand with her new boyfriend. Recently, Ms. Joyce, now Ms. Wilson, disputed the rationality of Attack's assignment of blame to her, stating that she had broken off the relationship with Attack long before his claimed breakdown.

In another instance Attack stated that he entered the mental hospital due to being "no longer capable of handling my mind", because he "was a Zen Buddhist" and therefore "could see ...no longer right or wrong." Attack's only formal involvement in Zen Buddhism, apart from reading books on the subject, was two days spent at the Throssle Hole Priory in Northumberland, in 1973.

In recent years, Attack has developed a deep seated and obsessive hostility towards the Church of Scientology, against which he casts all manner of hostile allegations. His hostility developed after a nearly

nine-year membership in the Church, from early 1975 to late 1983, during which he regularly proclaimed the benefits of Scientology. During this time period Attack appeared to be living a life devoid of the anti-social and criminal tendencies and psychological problems of his pre- and post-Scientology periods. It appears not to have occurred to Attack that it is illogical to blame the Church of Scientology for his problems, given his previous history of mental difficulties and the marked disappearance of these difficulties during his Church membership.

Descriptions by visitors to Attack's home explain why his wife Noella finally asked him to leave. Attack had become a virtual hermit, not taking care of himself or his family. He was living and sleeping in the attic, not with his wife. She apparently had moved him into the attic due to his incessant complaints.

Ironically, it appears that, despite Attack's obsession now with destroying the Church, the years he spent in Scientology were the only time when he appeared to consistently overcome severe difficulties in coping with life.



SCIENTOLOGY CAREER

Attack always misrepresents his Scientology career, presumably so that his claim to be an "expert" on Scientology has some credibility. For instance, in a letter to the Chichester Observer, published in December 1992, Attack claimed that during his membership of the Church "he spent an enormous amount of time and money completing the equivalent of 24 of the 27 available levels of Scientology". In fact, although he was a member of the Church of Scientology for about 9 years, he completed only a small amount of very low-level training in Scientology religious philosophy. Furthermore, although he claims to have completed 24 levels of Scientology counselling, it seems that he in fact did not complete these properly at all: he admits in his book that the "success stories" he wrote during his membership of the Church (evidencing his completion of Church counselling levels and other services) were untrue (and he thought as much at the time).

In particular, Attack never received any training in the areas in which he now claims special expertise: he never took any courses in the Church's administrative technology, nor the Church's ethics system, nor in the Church's financial management system.

Attack was never a member of Church staff, only ever a parishioner. He applied to become a Church staff member, but was rejected as unsuitable due to his criminal and psychiatric history.

Finally, as Attack even admits, he ultimately could not live up to the ethical standards expected of a Scientologist. He says in his book he would have preferred an atmosphere where the staff in charge of ethical standards would "apologize for having to apply policy." What he does not say in his book is that his complaint was that it was insisted that he pay outstanding court fines for his earlier drug convictions before he would be allowed to take part in Scientology services. Rather than approach the high standards that others welcomed, Attack says he "quietly" left Saint Hill.



ILLEGAL DRUGS

Attack has a long history of involvement with illegal drugs, both the usage and sale thereof.

Attack's in-laws report he was expelled from King Edwards Grammar School of Lichfield, for illegal drug use and excessive absenteeism, in about 1971. The purchaser of the Caven-Attack family home, reported finding marijuana plants when he purchased it six years ago. In-laws confirmed that Attack was growing marijuana in the mid-1970's at the family home.

According to the Lichfield Mercury newspaper, Attack was convicted for possession of cannabis in February, 1973. He was convicted for growing marijuana in January, 1975.

He was arrested on January 14, 1976 for the non-payment of court imposed fines resulting from his two earlier drug offense convictions.

By his own admission he was a dealer of cannabis and LSD between August, 1972 and August, 1974, including hooking at least 5 people on LSD who had previously not used it. He used cannabis, LSD, mescaline, cocaine, DMT, barbiturates and amphetamines in a time period from at least as early as 1971 to December 1974.

His usage of illegal, mind-bending drugs was interrupted for a period of about 9 years during his involvement in the Church of Scientology, which strictly forbids the use of all illegal drugs. However, after having left the Church in 1983, he reverted to drug usage. An eyewitness reported seeing him consume marijuana on at least 2 occasions in recent time. Attack commented to the witness that he bought his cannabis in East Grinstead and that it was easy to obtain, indicating that he was a regular user of the drug. Other eyewitnesses reported his usage of cannabis has been chronic since leaving the membership of the Church of Scientology. Even more recently, Attack's 9 year old son expressed worry to a school friend that his father was taking drugs. The boy said it was a "special sort of drug which looked brown and had to be smoked in a pipe" and that Attack would "get dizzy" afterwards.



ABUSE AND MANIPULATION

Mrs. Lavinia Joyce told Attack's mother-in-law, Mrs. Milner, that he had been violent towards her daughter, Karen Joyce, in about 1974. Ms. Joyce, now married to a David Wilson, and residing in the Northern Territory, Australia, spoke about her relationship with Attack. She stated that she was 16 at the time of her involvement with Attack, and has since dealt with the details of conflicts that ensued when she ended her relationship with him by putting them out of her mind. She recalled that Attack struck her on four or five separate occasions, and that during their brief relationship Attack took approximately 60 pounds from her that he never repaid.

According to relatives of Attack's wife, Noella (nee Milner), in 1975 extreme anguish and suffering was caused by Attack to Noella's parents and family through his inducing her, at age 17, and against her parents' wishes to run away from home with him. Her relatives describe Noella as having been an excellent student, a very attractive girl who could have had the pick of any young man in town, was expected to go on to have a very successful, rewarding and prosperous life, and of course expected to continue to bring joy and love to her parents and family. Until she fell under Attack's spell.

Noella was described as the apple of her father's eye, and he was described as heartbroken when Attack spirited her away. He died a few years later still upset by this traumatic time.

These same relatives stated that the circumstances of Attack's removing Noella from her family home were so distressful that they even contemplated taking legal action to prevent him from doing so. Since that time, Attack has apparently never visited any of her family, who still reside in the Lichfield area. Up to the time of Attack's separation from Noella, she would occasionally visit her family, and occasionally her mother would visit her, but only when Attack was away from home.

Noella's mother has also accused Attack of being a mesmerist, manipulating people to his will. She described him as the "devil incarnate". In 1975 Mrs. Milner also stated that she would like to see Noella get married - to anyone but Attack.

Noella's younger brother, Alex Milner, was profoundly affected by having to witness the upset to his parents caused by Attack's alienation of Noella's loyalty to and affection for them. From his observation of Noella during her family visits over the intervening years he described her as "spaced out", and as having been "brainwashed" by Attack. Alex said, "I'll be honest, I thought she was hypnotized". He stated that Noella was hooked on illegal drugs by Attack. He stated that when Noella brought the children for the family Christmas celebration in Lichfield, without Attack in attendance, that the children's astonished and joyous reaction to receiving Christmas gifts indicated that they were not so blessed with such childhood joys in their own home.

The members of Noella's family feel that Noella has been trapped in poverty and treated as a slave, and that her life has been ruined by her having come under Attack's sway.

They also noted that Attack has "never done an honest day's work in his life." The degree to which Attack used Noella is appalling. For example, he refused to drive a car, and whenever he had to go somewhere she had to drive him. When she drove him he generally sat in the back seat of the car as the "lord of the manor", and she had to act as his chauffeur.

The family members' descriptions of Attack's manipulation and exploitation of Noella are consistent with other eyewitness accounts over the years. In fact, Noella informed one person in November 1981 that Attack was marrying her to have a housewife and a secretary.

According to other eyewitness accounts, for years, while Attack was being financially supported by Robert Mitchell Beedie, and ostensibly working as an artist painting pictures, Noella had to do all the housework, cleaning, cooking, as well as secretarial work (handling bookkeeping, correspondence, typing) and also go out and try to sell his paintings. Attack continually disciplined Noella for failing to sell a sufficient number of his paintings. This appears to have been another incorrect assignment of blame by Attack, as his paintings were described by one relative as, "that blotchy pile of rubbish"; and by another past acquaintance, as, "painting - if you could call it that".

Finally, in late 1994, Attack left his wife and children, with no visible means of support, and moved back in with his mother in Nottingham.



ANTI-RELIGIONIST

It is perhaps understandable that Attack has found a home in the anti-religious community since religions generally espouse strict ethical and moral standards.

Attack has expressed a recurring opposition to and criticism of a number of religions. In addition to his hostile statements regarding Zen Buddhism and the Scientology religion, in 1976 he claimed to be writing a play that was an "anti-Christian thing". He also once admitted that he "took the bible apart" because he "likes to deal in facts not fiction." After doing this he found many things in the Bible that "did not make sense."

In recent years, Attack has openly allied himself with a number of people around the world who vehemently oppose various religious movements, commonly referred to collectively as the "Anti-Religious Movement". This network of hate mongers constantly strives for acceptance and legitimacy in government and professional circles but is known to be riddled with criminals and involved in deprogrammings, which sometimes consist of kidnappings, assaults and false imprisonments, and for which several of its members have been convicted.

In Attack's book, for example, he praises Cyril Vosper — a UK deprogrammer who was jailed three years prior to publication of the book for kidnapping and causing bodily harm to one church member. A letter from Vosper, presented as evidence for the prosecution at his trial, revealed much about the motives of deprogrammers: "This German one could be the beginning of the flood...." wrote Vosper. ... "This time next year, we'll probably be rolling in money, Audi 200 Quattros, caviar on our cornflakes."

In fact even Attack's publisher, Lyle Stuart, is a self-confessed atheist. In a book written about his deceased wife in 1972 he stated, "My wife and I are rational thinkers. We consider most religion insanity — and all belief in any personal god or gods to be total foolishness. We are not 'agnostics' — we are atheists."

In late 1993, Attack's wife stated that he was "mentally ill" indicating his obsession with Scientology as his mental illness. She was asked why Attack does not receive help from a psychiatrist and stated that Attack cannot accept "positive correction" and that whenever "positive correction" is offered him he becomes "evil".



ANTI-SOCIAL ACTS RESUME AFTER LEAVING THE CHURCH

In Attack's defense at his trial on criminal charges of growing marijuana plants in January 1975, Malcolm Faber stated to the court that Attack "had taken the attitude that he was above the law, but now realized that the law was right". This was apparently short lived.

Since Attack's departure from the Church of Scientology, he has engaged in or been involved with many anti-social and illegal activities in furtherance of his irrational vendetta against the Church.

In October of 1983, shortly after Attack left the Church of Scientology, he joined together with Ron Lawley, Steve Bisbey, Morag Bellmaine and others in an attempt to set up a rival, competitive group which depended on its existence by attempting to lure others from the Church of Scientology to receive their version of Scientology spiritual teaching and counselling.

On 9th December 1983, Bellmaine, Robin Scott and Ron Lawley travelled to Copenhagen, Denmark, and entered the Church of Scientology Advanced Organization for Europe and Africa, impersonating Church officials, they gained unauthorized access to and stole confidential Church scriptures and fled back to England with them.

Robin Scott was subsequently arrested when he returned to Copenhagen on March 13, 1984, admitted to his part in the crime, and on April 18, 1984 he was convicted, given a 4 months jail sentence, and banned from Denmark for 5 years.

Typically, Attack, knowing they were stolen, made a copy of the stolen materials obtained from the criminals.

Attack has also been found to be in possession of infringing copies of documents stolen from the Church of Scientology Western United States ("CSWUS"), Los Angeles, California, in January of 1990. This theft was not discovered until February, 1993, when copies of internal documents belonging to that Church surfaced in a court case in the United States Federal Central District of California in Los Angeles.

Investigation determined that the documents had been stolen by one Curtis Harmon a former staff member of CSWUS, immediately after he had been subjected to a "deprogramming" by two close associates of Attack, Hana Whitfield and Jerry Whitfield. Harmon confessed to the theft and stated that after the deprogramming, under cover of darkness, the Whitfields accompanied Harmon to the CSWUS premises where he entered the premises, gathered personal possessions, then entered an office and took internal memoranda and dispatches belonging to and copyrighted to CSWUS, left the premises and gave the purloined documents to the Whitfields.

In July 1994 Attack also admitted during deposition testimony that he had made copies of yet other documents he knew to have been stolen from the British Church of Scientology and had distributed them

in exchange for money. Attack also confessed that in 1984 he had obtained stolen Scientology materials, then made and distributed copies.



INTEREST IN BLACK MAGIC

Visitors to Atack's home learned that his attic retreat contained several large books on black magic, one in particular that is extremely offensive and contains black magic rituals involving bestiality, sex with children, torture, human and animal sacrifices and other satanic and inhuman practices. Atack reportedly spent much time in his attic burning incense. He seems to be fixated on this subject.



FAILURE AT EVERY TURN

Attack appears to have never had steady employment. He attempted unsuccessful careers as a drummer, painter, playwright, and novelist. Apparently motivated by his obsessive hatred of the Church of Scientology, between 1984 and 1990 he managed to write and get published a book highly critical of the Church. However the book reportedly only sold 3000 copies worldwide, generated no profit, and was therefore a complete failure. There is no record of his ever having had steady employment although he is now 39 years old, which raises the question as to just how he does earn a living. This is apparently a very touchy question for Attack.

Several family members stated with some disgust that Attack has never worked an honest day's work in his life. Attack depends heavily on the charity of others for his support. Recently this came from his brother James, an executive for British Petroleum. From the mid-1970's to late 1980's, Attack relied on a friend, Robert Mitchell Beedie, for financial support. Attack convinced Beedie to fund the purchase of his house, and to pay 200 to 250 pounds per week to support the household. Attack apparently also persuaded Beedie that he, Attack, should manage Beedie's finances, taking control of Beedie's income and used it to his own benefit too.



DEPROGRAMMING

Attack's claims a specialty in "deprogramming", or as he euphemistically refers to it, "exit counselling" or "intervention", wherein he is paid, usually by misinformed parents of a member of the Church of the Scientology, to attempt to break their child's faith and dissuade them from membership in the Church. Usually the parents will pressure their adult child to meet with Attack, with threats of taking action against the Church legally or with the media. Sometimes the target will be lured into meeting Attack. He sometimes misrepresents himself as a Scientologist to gain their confidence.

In a deprogramming, Attack, using a combination of scurrilous statements, innuendo, twisted bits of information taken out of context from Church documents, and selective relay of stories from a few other disgruntled ex-Scientologists, seeks to undermine faith and turn the targeted member of the Church against the Church, Founder and Religion of Scientology. Attack's "information" is entirely slanted to be negative, thus creating a false picture. Attack's techniques could be simply described as an act of bigoted propagandizing and hatemongering.

Attack claims to charge an average of 50 pounds per hour for his deprogramming and consultation "services", whether they are successful or not and often they are not. Attack has no training or qualifications to do "exit counselling". He has no degree, no accreditation, no certification as a "counselor" of any sort. "Deprogramming" is not part of the curriculum of any university, and the subject is generally disreputable. Many deprogrammers or "exit counselors" have been the subject of prosecutions for kidnapping, assault, false imprisonment and similar crimes in the United States, Germany, Italy, Australia, Spain and the United Kingdom.



FOMENTING HATRED - MANIPULATING THE MEDIA

Attack considers a key tactic to create business for himself is to cause publication or broadcast of and derogatory media accounts of the Church of Scientology.

Attack seeks derogatory publications or broadcasts about the Church as a means to create hysteria, hatred and fear, thus planting seeds which he hopes to later harvest, in the form of consultations and deprogrammings sold, claimants for new legal actions which he can then be paid to "consult" on, and as the basis for yet more new derogatory media on the Church to create another round of "clients".

Attack manipulates the media. He employs various tricks to make the stories he wants run appear newsworthy or topical, like those described in his comments in April, 1991 to a meeting of an anti-religious group which he is affiliated with, Family Action Information and Rescue ("FAIR"):

"The people who get served first are the people who complain...pushy people are the people who are listened to in this world, because they are such a nuisance and you want to get rid of them and the same with MPs, if you've got people lobbying pushing them all the time - 'What are you doing about it' then the pressure begins to work. They've got to quieten down the constituent, got to quieten down the lobbyists. So they've got to do something about it. It can't just sweep it away..."

"In general terms, bothering the media, annoying the media, you know and surveys...I think we all have a tendency to feel that if 10 people tell us something there is some kind of mass movement out there."

"If people keep coming up and telling me about something day after day after day, then I start thinking it must have pervaded the society. Now it could just be 10 people on my street know about it, but I will have that feeling. And if you are a newspaper reporter and five or six people have rung up the news desk that week saying 'What about this story, we are worried about this story', then there can be a certain amount of meaning..."

"Put pressure on them. It makes them aware of it. Not antagonism and being unpleasant to them, just ringing them up and saying 'Are you going to run a story about this...'"

"What it takes is a group of people picking stories up, press clipping agencies, somebody having the money... Ian (Haworth) probably already does get press clippings I should imagine, but once you are getting the stories from the clipping agencies all you have to do is photocopy the stories and get them off and give Ian some sort of back up by people picking the phone up and saying 'Look, this is an incredible story...'"

UNDERLYING MOTIVES

Attack proclaims publicly that he is merely seeking to "make information known" about the Church of Scientology, to "help" people. In less public settings he reveals his true motives, which are, simply stated, to profit from his intention to destroy the only group which ever helped him. His wife has referred to his expectations to be paid a large sum of money by the Church in exchange for the cessation of his activities.

Since leaving the Church of Scientology in September of 1983, Attack has constantly told others that the Church of Scientology was "disintegrating" or about to be closed down or financially wiped out. Probably his only means of justifying his senseless battle, nothing could be farther from the truth.

While Attack believes that his gross distortions might influence media, government agencies or a few unsuspecting public, the Church of Scientology was fully recognized as a bona fide tax exempt religious organization by the United States Internal Revenue Service in October of 1993. In all more than 150 Scientology organizations were recognized by the US government. The prophecies of doom are what Attack wanted others to believe, for if convinced the Church was closing they would be more likely to leave it. Attack's message has been his own delusion, as the facts show.

In 1980, just prior to Attack's departure from the Church, there were 328 Scientology Churches, Missions and Groups throughout the world. Now more than 2,000 organizations are operating in 106 countries around the world. By 1994 114 million copies of 244 books by Scientology Founder L. Ron Hubbard are in print in 30 languages in more than 100 countries. There are 10,000 staff in Scientology organizations and last year some half-million people were introduced to Scientology for the first time. Church expansion has even reached the former Soviet Union where dozens of groups have sprung up in the last two years.

Attack's desperate and wasted attempts to affect Scientology are reflected in his statements about the Church of Scientology Mission of Bournemouth. Attack recently claimed regarding the Executive Director, Roger Kaye, that he, "...has got to be bankrupted, he's got to be taken out, because he's too bloody good at it....".

Attack's "prophecies" and propaganda show his true colors. Fruitless attempts at harming the Church and Church members, with the hope of the ultimate pay off, is the common denominator of Attack's current activities - a variation of the old "protection racket" run by mobsters.

EPILOGUE

Attack pretends that he has "information" about the Church of Scientology that the Church does not tell its own members. But after reviewing Attack's "confidential" documents, one man said, "someone in the Church had already given me most of them, including a copy of the booklet written by one local antagonist [Attack himself], and suggested I read the whole lot and make up my own mind. I did not have to read many pages before I found several things [Attack claimed] that I knew from my own experience [in Scientology] were completely misleading."

Because he is paid only to give negative opinions about Scientology, Attack's bias against the Church is preconceived. He has admitted during testimony that positive information about Scientology from individuals whom Scientology has benefitted is completely discounted by him. Because he is not a real expert, nobody expects an objective opinion from Attack and those who are seeking one go elsewhere.

Attack's claims to expertise are only believed by individuals unfortunate enough to be taken in because they know nothing about him.



Friday, February 18, 1934

"The apparently feared that the Church might direct his hands by influencing readers and to do anything, states his judge," Mr. Maxwell

The next letter
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Jon Alach 1988-1990

Friday, November 4, 1994

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Cult critic loses case

John Drost with the poster he
claimed was published by the
church to spread misinformation
about him



Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450

In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL,)
a California not-for-profit)
religious corporation,)

Plaintiff,)

vs.)

GERALD ARMSTRONG; MICHAEL WALTON;)
THE GERALD ARMSTRONG CORPORATION)
a California for-profit)
corporation; DOES 1 through 100,)
inclusive,)

Defendants.)

No. 157 680

**DECLARATION OF
NANCY MC LEAN
IN OPPOSITION TO
MOTIONS FOR SUMMARY
ADJUDICATION OF 20TH
CAUSE OF ACTION; AND
13TH, 16TH, 17TH &
19TH CAUSES OF ACTION
OF SECOND AMENDED
COMPLAINT**

Date: 4/21/95
Time: 9:00 a.m.
Dept: One
Trial: 5/18/95

1
2 DECLARATION OF NANCY MC LEAN

3 I, Nancy McLean, declare:

4 1. I am over the age of 18 years. I am a resident of the
5 Province of Ontario, Canada and I have personal knowledge of the
6 matters set forth herein, and if called upon as a witness herein
7 I could testify competently thereto.

8 2. I am making this declaration in support of Gerald
9 Armstrong whom the Scientology organization is seeking by court
10 order to silence.

11 3. I am the Nancy McLean named in the Order in the case
12 Nancy McLean and John McLean v. Scientology, et al. in the United
13 States Court of Appeals for the Eleventh Circuit dated September
14 17, 1991, which the Scientology uses in its efforts to silence me
15 and other persons with knowledge of its practices. A copy of
16 this order is attached hereto as Exhibit A.

17 4. I was a member of Scientology in Canada from 1969
18 through October, 1972. During my time in Scientology I observed
19 considerable mistreatment of people and other organizational
20 illegalities. I wanted Scientology to thrive and brought my
21 concerns about these activities to the attention of seniors in
22 the organization, all the way up to Scientology's founder, L.
23 Ron Hubbard. My concerns were ignored, I was lied to, and I
24 left. I subsequently became a critic of Scientology's antisocial
25 and often criminal practices. As a result of my criticisms I was
26 declared an "enemy" and "fair game." The "fair game" policy,
27 which was written by Hubbard, calls for people designated as
28

1
2 "enemies" to be tricked, sued, lied to or destroyed." I am
3 intimately familiar with this obnoxious policy.

4 5. As result of its "fair game" attacks on me and my
5 family, I filed a lawsuit against Scientology in 1981. This
6 lawsuit settled in 1986. I agreed to the monetary figure
7 settling the case, but would not agree to the conditions
8 Scientology sought to impose which would have stripped my
9 personal liberties. I was, however, subjected to enormous
10 pressure by those with control of the case, whom I believe to
11 have been compromised by Scientology's fair game operations. It
12 was well known at that time that Scientology had attempted to
13 entrap and compromise a federal judge sitting on Scientology
14 cases, and to frame and compromise other government officials,
15 and had infiltrated legal offices involved in Scientology
16 litigation. Being put in a hopeless corner, and having no other
17 choice, I did succumb and did sign a "settlement agreement,"
18 which on its face prohibited me from discussing my experiences in
19 Scientology, Hubbard, and the "religion" itself, and prohibited
20 me from possessing its writings and counseling people concerning
21 these writings.

22 6. I knew at the time that this "agreement" was illegal
23 because it sought to keep me silent about the criminal past of an
24 organization with present criminal intent, and criminal policies,
25 which are a threat to decent people and civilized society
26 everywhere. I hoped that Scientology would discontinue its "fair
27 game" attitude and activities after the "settlement" and I hoped
28

1
2 for peace for all. I also felt and feel that I have a moral
3 obligation to counsel anyone who seeks me out concerning my
4 knowledge of the dangers of this organization. I continue to do
5 so, despite the risk its court orders and "fair game" activities
6 are to my freedom and life.

7 7. Since leaving Scientology, and through the years of
8 threats and attacks by this organization, a deep-felt spiritual
9 conviction has developed in me concerning the religious nature of
10 what I am involved in. Scientology claims that all of its
11 policies and directives, even those which order attacks on
12 critics, which call for using the legal system to harass innocent
13 people, which declare and label people "suppressive persons" and
14 "fair game," which assert that people it views as "low-toned"
15 have no civil rights, which state that some people have no right
16 to life at all, all of these and more, are "religious
17 scriptures." Scientology claims that all of its practices are
18 religious in nature and protected by the US Constitution and the
19 laws of every country granting religious liberty. Can,
20 therefore, my activities, in opposing such antisocial policies
21 and activities, be any less religious? Indeed, they are not! My
22 conviction that I should speak out for freedom and against
23 Scientology's tyranny, is as honestly held and as religious as
24 the conviction of Scientology's leaders to promote and enforce
25 their "religious" tyranny.

26 8. Scientology can no more prevent me, under the laws of
27 civilized nations, from possessing its "scripture," or commenting
28

1
2 on or counseling people about these "scriptures," or Hubbard, the
3 source of these "scriptures" than a Christian church can prevent
4 me from possessing, commenting on or counseling people about the
5 Holy Bible, Jesus Christ or God Almighty. I protest that
6 Scientology is not a church, and antithetical to religion.
7 However, as long as it claims to be a church and a religion, and
8 obtains the extraordinary benefits conferred by our laws on
9 churches and religions, it cannot silence me about its past, its
10 leader, its policies and practices, or my experiences of any kind
11 in it or in relation to it.

12 9. I am going to continue to speak freely to anyone who
13 seeks me out about Scientology, despite any threat from any
14 court, or from Scientology itself. I am going to freely possess
15 its "scriptures" and writings about its "scriptures," despite any
16 threat. I am going to counsel anyone who seeks me out concerning
17 my knowledge of these "scriptures" and Scientology's "religious
18 practices," and my "religious experiences."

19 I declare under the penalty of perjury under the laws Canada
20 and the United States of America that the foregoing is true and
21 correct.

22 Executed in Sutton West, Ont Canada
23 this April 5th day of _____, 1995.

24
25 Nancy McLean
26
27
28

DO NOT PUBLISH

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

No. 89-3505
Non-Argument Calendar

District Court Docket No. 81-174-CIV-T-17

NANCY McLEAN, and
JOHN McLEAN, her son,

Plaintiffs-Appellants,

versus

THE CHURCH OF SCIENTOLOGY OF CALIFORNIA,
MARY SUE HUBBARD, L. RON HUBBARD,
JOSEPH PETER LISA, MILTON WOLFE and
MERCEL VANNTER,

Defendants-Appellees.

Appeal from the United States District Court
for the Middle District of Florida

(September 17, 1991)

Before PROFFAT, Chief Judge, JOHNSON and EDMONDSON, Circuit Judges.

PER CURIAM:

Appellant McLean appeals the district court's order permanently enjoining her from disclosing any information about her lawsuit against

the Church of Scientology (Church) and the resulting Settlement Agreement entered into between McLean and the Church. We affirm.¹

McLean and her son sued the Church in 1981. In August 1986 McLean and the Church entered into a court-supervised Settlement Agreement requiring the Church to pay an undisclosed sum to McLean and requiring McLean to turn over to the Church any documents relating to the litigation and prohibiting McLean from, among other things, discussing with anyone, other than immediate family members, the circumstances surrounding the litigation or discussing any factual evidence that might have supported the litigation. In March 1988 the Church moved for a preliminary and a permanent injunction, claiming

¹ The outcome of this decision was delayed pending final resolution of the issues in Wakefield v. Church of Scientology, ___ F.2d ___ (11th Cir. 1991) (finding moot the motion filed by local newspapers seeking access to the Settlement Agreement entered into among the Church and various plaintiffs). Because the Wakefield decision has no impact on the merits of this case, we need discuss it no further.

that McLean was violating the terms of the Settlement Agreement and that she should be enjoined from further violations.²

The district court referred the matter to a magistrate judge. The magistrate judge admitted into evidence affidavits submitted by the Church, indicating that McLean had violated the terms of the settlement agreement. The magistrate judge also heard testimony from McLean, who was given a full opportunity to rebut the matters contained in the affidavit. After considering the matter, the magistrate judge issued a Report and Recommendation concluding that McLean violated the Agreement. The district court accepted the Report and Recommendation and entered against McLean a preliminary and a permanent injunction that enjoined her from further disclosing the substance of her complaint and claim against the Church, alleged wrongs committed by the Church and the substance of documents that were returned to the Church under the Settlement Agreement. This appeal followed.

² Because the record in this case is under seal, our outline of the underlying facts of this appeal will be cursory.

McLean claims that the permanent injunction against her further disclosures should be reversed because the district court failed to give her proper notice that it consolidated the preliminary- and permanent-injunction hearings. We disagree. Although "it is generally inappropriate for a federal court at the preliminary-injunction stage to give a final judgment on the merits," University of Texas v. Camenisch, 101 S. Ct. 1830, 1834 (1981) (citations omitted), Rule 65(a)(2) of the Federal Rules of Civil Procedure allows consolidation of the preliminary-injunction hearing and the hearing on the merits of the permanent injunction. Fed. R. Civ. P. 65(a)(2). Before preliminary- and permanent-injunction hearings can be consolidated, though, parties must have notice of consolidation. Id.; Ell Lilly & Co. v. Generix Drug Sales, Inc., 460 F.2d 1086, 1106 (5th Cir. 1972).³ The district court's failure, however, to give notice "is not a sufficient basis for appellate reversal; [McLean] must

³ This court adopted as precedent all decisions of the former Fifth Circuit Court of Appeals decided prior to October 1, 1981. Benner v. City of Pritchard, 661 F.2d 1206 (11th Cir. 1981).

also show that the procedures followed resulted in prejudice, i.e., that the lack of notice caused [McLean] to withhold certain proof which would show [her] entitlement to relief on the merits." Id.; cf. Garcia v. Smith, 689 F. 2d 1327, 1328 (11th Cir. 1982). After reviewing the record, we conclude that McLean has not been prejudiced.

At the preliminary-injunction hearing, McLean testified among other things that she had reacquired certain documents turned over to the Church and that she was using these documents to "counsel" Church members. She testified further that she had discussed certain aspects of her suit against the Church with persons who were not members of her immediate family. If we view this testimony in the light most favorable to McLean and if we assume that any evidence she might have presented at a later hearing on the merits would have fully corroborated her testimony, we would still find that she violated the terms of the Settlement Agreement. So, because McLean in effect conceded that she was violating the terms of the Settlement Agreement, we conclude that she was not prejudiced by being denied notice of the consolidation of her preliminary and permanent injunction hearings.

McLean also argues on appeal that the district court erred in holding that reacquisition and disclosure of reacquired documentary evidence violated the Settlement Agreement. We find this argument to be completely without merit. If the district court had held that reacquisition alone violated the Settlement Agreement, we might be influenced. The district court, however, held that reacquisition and then disclosure violated the Settlement Agreement. We agree.

III

For the foregoing reasons, we AFFIRM the district court's order of preliminary and permanent injunctive relief to the Church.

PROOF OF SERVICE

I am employed in the county of Marin, State of California.
I am over the age of eighteen years and not a party to the above
entitled action. My business address is 711 Sir Francis Drake
Boulevard, San Anselmo, California 94960. I served the foregoing
document(s) described as:

**EVIDENCE, VOLUME ONE - DECLARATIONS BY THIRD PARTIES IN
OPPOSITION TO SCIENTOLOGY'S MOTIONS FOR SUMMARY
ADJUDICATION OF THE 20TH CAUSE OF ACTION; AND 13TH, 16TH,
17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT**

on the following persons on the date set forth below, by placing a
true copy thereof enclosed in a sealed envelope with postage thereon
fully prepaid to be placed in the United States Mail at San Anselmo,
California:

Laurie J. Bartilson, Esquire
BOWLES & MOXON
6255 Sunset Boulevard, Suite 2000
Los Angeles, CA 90028

MAIL

Michael L. Walton, Esquire
P.O. Box 751
San Anselmo, CA 94979

MAIL

☒ (By Mail) I caused such envelope with postage thereon
fully prepaid to be placed in the United States
Mail at San Anselmo, California.

☐ (Personal) I caused said papers to be personally served on
the office of counsel.

☒ (State) I declare under the penalty of perjury under
the laws of the State of California that the
above is true and correct.

DATED: April 12, 1995

